



State of Louisiana

Department of Environmental Quality



M. J. "MIKE" FOSTER, JR.
GOVERNOR

L. HALL BOHLINGER
SECRETARY

May 14, 2003

CERTIFIED MAIL - RETURN RECEIPT (7001 0320 0003 0931 7976)

Mr. Gene Keepper, RCRA PM (6EN-HX)
US Environmental Protection Agency
1445 Ross Avenue, Suite 900
Dallas, TX 75202-2733

RE: Review of "Water Management Plan"
SBA Shipyards, Inc.; Agency Interest Number 1478
At the Foot of State Highway 3166, Jennings, Jefferson Davis Parish

Dear Mr. Keeper:

We have received and reviewed the "Water Management Plan" for the referenced facility dated April 23, 2003, submitted as an attachment to a letter by Michael Pisini & Associates. Thank you for requesting this information be submitted to us for review and comment. Based on a technical review of this document, we have the following comment/concern. It is anticipated that this comment will be addressed in a revision of the referenced plan, or in future work plans or submittals, as directed by the EPA, which remains the lead agency for the site.

General: The plan does not specify the off-site disposal or treatment facility that is to receive the managed wastewater that is to be stored in the partially buried barge. This facility should be identified to the EPA and LDEQ prior to transportation and disposal, and the permit and acceptance criteria for this facility must be met.

If anyone has any questions concerning this matter, they may feel free to contact me at my desk line (225) 765-0477, by pager (225) 952-3744, or by e-mail at k_horn@ldeq.org. All future correspondence regarding this matter should be submitted in triplicate and directed to:

Keith L. Casanova, Administrator
Remediation Services Division
P.O. Box 4314
Baton Rouge, LA 70821-4314.



Mr. Gene Keepper, RCRA PM
May 14, 2003, Page 2

Please note that this is a new address to which all future correspondence must be sent.
This change in address is related to the upcoming move of the LDEQ to the Galvez Building in downtown Baton Rouge.

One of the copies should be directed to my attention. Please include the Agency Interest (AI) number and name referenced above on all correspondence. By always using the correct AI number and name, delay and misfiling can be avoided. Thank you for your cooperation.

Sincerely,

A handwritten signature in blue ink, appearing to read "Keith Horn", with a long, sweeping horizontal stroke extending to the right.

Keith Horn, Staff Environmental Scientist
Remediation Services Division

klh

c: LDEQ File Scanning Room 1400-IAS

Mr. Michael A. Chernekoff
Jones, Walker, Waechter, Poitevent,
Carrere & Denegre, L.L.P.
201 St. Charles Avenue
New Orleans, Louisiana 70170-5100

Mr. Robert E. Leslie, Jr. P. E.
Michael Pisini & Associates
1100 Poydras Street
1430 Energy Center
New Orleans, LA 70163



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Keith Horn, Staff Environmental Scientist
Remediation Services Division

klh

c: LDEQ File Scanning Room 1400-IAS

Mr. Michael A. Chernekoff
Jones, Walker, Waechter, Poitevent,
Carrere & Denegre, L.L.P.
201 St. Charles Avenue
New Orleans, Louisiana 70170-5100

Mr. Robert E. Leslie, Jr. P. E.
Michael Pisini & Associates
1100 Poydras Street
1430 Energy Center
New Orleans, LA 70163

MICHAEL PISANI & ASSOCIATES, INC.

Environmental Management and Engineering Services

1100 Poydras Street
1430 Energy Centre
New Orleans, Louisiana 70163
Telephone (504) 582-2468
Facsimile (504) 582-2470
m.pisani@ix.netcom.com

13313 Southwest Freeway
Suite 221
Sugar Land, Texas 77478
Telephone (281) 242-5700
Facsimile (281) 242-1737
dangle@orbitworld.net

April 11, 2003

Mr. Gene Keepper, CHMM
RCRA Project Manager
U.S. EPA Region 6 (6EN-HX)
1445 Ross Avenue, Suite 900
Dallas, Texas 75202-2733

Subject: Clarifications to November 1, 2001 *Solidification/Stabilization Work Plan*
Interim Measures/Removal Action
SBA Shipyards, Inc. (Jefferson Davis Parish, Louisiana)
EPA ID No. LAD008434185
Docket No. RCRA-6-2002-0908
LDEQ AI No. 1478

Dear Mr. Keepper:

Based on site observations made on March 24, 2003, the following clarifications are made to the agency-approved November 1, 2001 *Solidification/Stabilization Work Plan*.

1. Material in the shallower southern end of the Oil Pit has a visibly higher solids content and noticeably thicker consistency than material in the deeper northern end of the Oil Pit (a person could almost safely walk on the southern end material).
2. Water in the Oil Pit will be pumped to the partially buried barge. Additional discussion of water management procedures is presented in the *Water Management Plan* submitted under separate cover, in accordance with the Agreed Order Statement of Work.
3. The high-solids material in the southern end of the Oil Pit will be solidified and allowed to cure.
4. The volume of solidified material in the southern end of Oil Pit will then be assessed.
5. If reagent addition and materials solidification significantly increases the volume of material in the southern end of the Oil Pit, solidified material in the southern end of the Oil Pit will be sampled, characterized and removed for offsite transport to the landfill.
6. During removal of solidified material from the southern end of the Oil Pit, a temporary cofferdam of solidified material will be used to retain material in the northern end of the Oil Pit.
7. The temporary cofferdam will then be removed and in-situ solidification of the remaining material in the Oil Pit will be resumed.

Mr. Gene Keepper
April 11, 2003
Page 2

If you have any questions or comments, please do not hesitate to call us.

Sincerely,

MICHAEL PISANI & ASSOCIATES, INC.

A handwritten signature in black ink, appearing to read 'R. E. Leslie, Jr.', written in a cursive style.

Robert E. Leslie, Jr., P.E.

cc: Mr. Michael A. Chernekoff (Jones, Walker, Waechter, Poitevent, Carrere & Denegre)
Mr. Keith Horn (Louisiana Department of Environmental Quality)

MICHAEL PISANI & ASSOCIATES, INC.

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April 11, 2003

Mr. Gene Keepper, CHMM
RCRA Project Manager
U.S. EPA Region 6 (6EN-HX)
1445 Ross Avenue, Suite 900
Dallas, Texas 75202-2733

Subject: Contractor and Subcontractor Qualifications
Interim Measures/Removal Action
SBA Shipyards, Inc. (Jefferson Davis Parish, Louisiana)
EPA ID No. LAD008434185
Docket No. RCRA-6-2002-0908
LDEQ AI No. 1478

Dear Mr. Keepper:

In accordance with Item II. of the December 9, 2002 Order and Agreement for Interim Measures/Removal Action at SBA Shipyards, Inc., Michael Pisani & Associates, Inc. is pleased to submit the attached qualifications packages for the following parties:

- PSC Industrial Outsourcing, Inc. (Contractor)
- Stranco, Inc. (Subcontractor).

This information is sent to follow up our April 10, 2003 electronic mail notification to you.

If you have any questions or wish to discuss this matter further, please do not hesitate to call us.

Sincerely,

MICHAEL PISANI & ASSOCIATES, INC.



Robert E. Leslie, Jr., P.E.

cc: Mr. Michael A. Chernekoff (Jones, Walker, Waechter, Poitevent, Carrere & Denegre)



STATEMENT OF QUALIFICATIONS

Oilfield Services



PSC INDUSTRIAL OUTSOURCING GROUP

543 Renaud Road
Lafayette, LA 70507

(337) 233-4889
(337) 233-4106 fax

Website: www.contactpsc.com

January, 2003



“one source, smarter solutions”

PSC Industrial Outsourcing Group

provides a comprehensive range of services to on- and offshore oil and gas production and drilling facilities. A major portion of our business is the ‘tank and vessel cleaning services’. This turnkey cleaning service includes product and solids removal, degassing, sludge processing, waste reduction, recycling, transportation, and disposal. **PSC’s** comprehensive ‘NORM remediation service’, both on- and off-site, provides the synergism that has made us the leading provider of environmental services in the oil and gas industry.

Another key component of our success is ‘dock side cleaning’ of boat and barges, including crude oil and fuel transport barges, drilling fluid tanks and dry bulk holding tanks.

What makes PSC the choice for your Industrial Service needs?

- Turnkey Cleaning Service Capability
- Safety Training Based on Behavior, Decision Making and Skill Development
- Value Creation for our Clients Through Integrated Service Lines
- Professional, Trained Personnel
- Support Services, Including Asbestos Abatement, Lead Abatement, Waste Disposal as well as Transportation Services



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Field and Fixed Facility Services



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Tank and Vessel Cleaning

PSC Industrial Outsourcing Group’s Tank and Vessel Cleaning services are strategically positioned along the Gulf Coast to service our clients. This customer base includes all the major oil and gas producers as well as most mid-sized companies and independents.

Since 1981 **PSC** has grown with our clients by providing safe, cost-effective and responsive services. With an experienced work force, this ensures that cleaning opportunities can be performed in this manner. **PSC** specializes in tank and vessel cleaning and entries, waste management, pipeline and facility flushing.

Here are some examples of how PSC’s experience and safe work attitude has benefited our clients.

- Improved efficiency because of large pool of experienced supervisors, foremen and technicians
- Reduced transportation cost of personnel and equipment as a result of facility location
- Continuous safety training, both in the class room and at job site, i.e. monthly safety meetings, training upgrades, tailgate safety discussions and Job Safety Analysis preparation



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Naturally Occurring Radioactive Material Remediation

PSC Industrial Outsourcing Group provides N.O.R.M. cleaning and decontamination using a variety of equipment and processes to enhance EPA and regulatory compliance. The radioactive material is found in virtually every oil and gas production facility. Fluids from certain oil and gas bearing formations containing these radioactive materials create localized radioactive deposits strong enough to be regulated.

Typically decontamination consists of a combination of hydro-blasting and heating techniques, depending on the degree of contamination. At **PSC’s** fixed facility in Amelia, Louisiana we offer both wet and dry methods of tubular decontamination

in addition to the typical cleaning processes, which can be effectively employed in the field as well.

Specific industries serviced

- Oil and Gas Industry
- Pulp and Paper
- Refining and Petrochemical
- Government

Features and Benefits

- Assessment, Removal and Packaging
- Decontamination both on-site and off-site
- Filter media decontamination
- Radiation Safety Officers
- Land remediation
- Waste Management
- Largest N.O.R.M. decontamination facility in North America



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Insulation, Asbestos Abatement and Carpentry Services

PSC Industrial Outsourcing

Group’s Insulation Services group

has become an integral part of the Gulf Coast Oil and Gas Division.

With an experienced and highly skilled workforce, they stand ready to provide professional services, both safely and cost-effectively.

Originally, the Insulation Services group began by offering a comprehensive array of **insulation** services and **asbestos abatement** solution. Recent expansion of the service line to include **carpentry** services has proven to be a significant step toward our *“one source, smarter solutions”* goal.

Summary of specific service capabilities:

- Freeze Protection (Heat Tracing)
- Hot and Cold Insulation
- Soundproofing
- Sampling, Analysis, Permitting Processes
- Asbestos Removal, Transportation and Waste Management
- Remodeling including Plumbing and Flooring and Ceiling Installation
- Metal Door and Metal Roofing Installation



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Coating and Blasting and Lead Abatement Services

PSC Industrial Outsourcing Group addresses your company's coating requirements with personnel unmatched in experience and safety performance. We utilize the latest technology and equipment to ensure client satisfaction. **PSC's** original philosophy of “expansion by developing an organizational structure comprised of leading industry personnel and providing them with the tools and equipment to complete projects in a safe and professional manner” remains the same today. The Coating and Blasting group has delivered professional results for major and independent oil and gas producers, drilling contractors, utility companies, as well as shipyards, pipeline

companies and gas plants and refineries.

Advanced capabilities of the group includes:

- Lead Abatement Including Total Containment
- Wet and Dry Abrasive Blasting
- Soft Abrasive Blasting
- Non-abrasive Blasting
- Surface Decontamination – SB/SQ process
- Fiberglassing
- High Performance Coatings
- Hand Tool Cleaning
- Tank Liner Applications
- Maintenance Coatings



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Crude Oil Reclamation and Saltwater Injection Facility

PSC Industrial Outsourcing Group

owns and operates a state-of-the-art crude oil reclamation and non-hazardous oilfield waste produced water disposal plant. The facility, located east of Jeanerette, Louisiana on State Highway 87 features an injection well, Coast Guard approved docking and transfer operation, thermal treating units and a truck receiving station that can accommodate six vacuum trucks.

The Jeanerette facility is permitted to receive salvage crude oil from the generator, allowing them to receive salvage value for what would otherwise be a costly disposal expense.

Non-hazardous Oilfield Waste

Accepted at this facility include:

- Salvage Crude Oil
- Salt Water
- Washout Water
- Oil Spill Waste
- Completion Fluids
- Gas Plant Waste
- Pipeline Test Water
- Pipeline Pigging Waste

Permitting Information:

- Facility Site Code – 5108
- Generator Code – P-156
- Serial Number 972558



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Emergency Response Services

Time is critical to efficient and cost-effective containment during an active spill. With our North American network of facilities, **PSC** can pull together large response teams, capable of expeditiously containing and removing a wide variety of oily and/or hazardous spilled materials.

PSC operates a regional operations center in Lafayette, Louisiana, which coordinates emergency response activities. **PSC** maintains OSRO ratings consistent with responding in rivers, canals, and inland waterways and is a member of the MSRC, Clean Gulf and NRC. The Louisiana response team carries a “B” rating for hazardous materials.

Emergency Response Features include:

- Containment, Removal, Storage, Treatment, Transportation and Disposal for Turnkey Response Actions
- 24-Hour Emergency Response
- Large Equipment Fleet
- North American Facility Network
- Oil-Spill Clean-up Supplies
- OSHA Hazwoper and NFPA 472 Hazardous Material Specialist
- Site Remediation
- Spill Response Planning Programs



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Synergistic Services Provided

PSC Industrial Outsourcing Group has strategically developed a core group of service lines that makes **PSC** a leader in the oil and gas services industry. This core group, when teamed with other outstanding **PSC** companies along the Gulf Coast and throughout North America can provide turnkey services unmatched by any others.

Decommissioning and demolition services are prime examples of the combined efforts of **PSC Industrial Outsourcing** groups. The sophistication level of the demolitions process is a function of the complexity of the project. **PSC** provides pre-process planning and engineering services through machinery and equipment

operations. Expediting of transportation and disposal is also an integral part of the turnkey services provided to our clients.

The obvious results to our clients are:

- Professionals with a Single Focus on Each Project
- Continuity in the Safety Process
- Pre-planning and Engineering Assistance
- Experienced Personnel
- Specialized Operational Procedures, Machinery and Equipment
- Integrated Service Lines



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Dockside Boat and Barge Cleaning Services

The oil and gas offshore drilling industry requires an efficient utilization of their marine transportation. In particular, boats and barges carrying drilling mud and/or drilling waste are in constant demand during active drilling periods. This is a major expenditure and therefore, efficient, effective and strategic cleaning services are required to keep the fleet in-service.

PSC Industrial Outsourcing Group meets those requirements through our network of full service cleaning facilities. Some of the **PSC** facilities are located dockside and offer turnkey cleaning and waste handling capabilities. All facilities maintain professional crews with state-of-the-

art equipment that are available 24 hours per day.

Waste Water Recycling and Reduction equipment, 3-D nozzles and air-mover trucks with operators are available as support when required. Each facility has trained personnel to assist in the management of waste as required. These facilities also clean containers etc. coming in from the production facilities throughout the Gulf Coast.

Facilities strategically located along the Gulf Coast include:

- Boothville/Venice, Louisiana
- Golden Meadow/Fourchon, Louisiana
- Morgan City, Louisiana
- Intracoastal City, Louisiana
- Cameron, Louisiana (servicing Port Arthur, Galveston and west)



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Other Solutions From the Oilfield Services Group

Rig Pit Cleaning

PSC Industrial Services Group

provides experienced personnel and equipment to perform superior rig cleaning services, both onshore and offshore. This service will “free up” your rig personnel to perform other activities and ensure a quicker resumption of drilling activities, resulting in significant cost savings and enhanced safety performance.

Total Waste Stream Management

How waste streams are managed today is very significant both in the short term for cost savings and in the long term for potential liability. **PSC** maintains a group of “Waste Stream Managers” that can oversee not only the disposal but also waste tracking. This is especially significant today

when environmental concerns play an integral part of any project.

Waste Transportation and Containers

PSC maintains and operates a fleet of liquid vacuum and air-mover trucks and equipment. These trucks are found throughout the Gulf Coast and North America. **PSC** also provides roll-off boxes and various other types of containers for waste storage and transportation.

Soap and Degreaser Sales

An integral part of our cleaning process is the specialty chemicals developed to improve efficiency of the process. These chemicals are stocked locally for cleaning projects and sales to our clients.



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Key Personnel



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Key Personnel – Gulf Coast Operations

Joey Shaw	Manager Oilfield Operations
Joey Comeaux	General Manager Offshore and Dockside Operations
Mr. Paul Thevis	Operations Manager Cleaning Services
Mr. Blake LeBouef	Operations Manager Coatings Group
Mr. Michael Conrad	Operations Manager Insulation Group
Mr. Paul Zimmerman	NORM Technical Services Manager
Mr. Pat Kennedy	Operations Manager N.O.R.M. Services
Ms. Mary Bergeron	Operations Manager Injection Facility
Mr. Jason Herpin	Manager Safety



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Key Supervisors



Key Supervisors – Gulf Coast Insulation Services

- Preston Russell
- Ernest Saltzman
- Tommy Louviere

Key Supervisors – Gulf Coast Coatings Services

- Glenn Dupre
- Ed Hill
- Bruce Tweedel
- Bobby Savoie
- Tim Ness
- Tommy Bailey
- Andrew Ozenne

Key Supervisors – Gulf Coasting Cleaning Services

- Brian Fontenot
- Tommy Domingue
- Dickie LaPoint
- Randy Mouton
- Leonard Kidder
- Scott Godcheaux
- Bobby Richard
- Tim Manual
- Ferron Prejean
- Thomas Lebeau



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Project Summaries



Annual Leg Inspection of Deepwater Platform

March 2002

Morgan City, Louisiana Deepwater Gulf of Mexico

T. L. P. Leg Entry, Decontamination and Corrosion Repair

- Take part in pre-project planning activities
- Prepare safe entry procedures
- Develop contingency plans for repairs
- Enter legs, decontaminate and prepare for repairs
- Preparation of grid plan for tank repairs
- Determine procedures for welding repairs
- Supply certified/tested welders to perform repairs on internals of TLP legs
- Condition space and prepare surface for coatings application

Dollar value of contract: \$270,000.00

Offshore Facility Abandonment

August 1998

Matagorda, Texas

Abandonment of offshore production platform

- Site visit and preparation of procedures and cost estimates
- Evaluation of potential environmental hazards
- Coordination and scheduling of marine transportation
- Mobilization of personnel and equipment
- Pipeline flushing, tank and vessel product removal and deck drain flushing
- Production system decontamination and degassing
- Waste packaging and manifesting to disposal
- Coordination of waste transportation to shore base for disposal
- Severing of all overboard pipelines

Dollar value of contract: \$200,000.00

Asbestos Abatement of Fire Damaged Living Quarters November 2002

Intracoastal City, Louisiana

Fire totally destroyed offshore living quarters for major oil company. Crew quarter contained asbestos and remaining ash tested positive.

- Personnel dispatched to evaluate and test the ash residual for asbestos content



- Subsequent to the evaluation, a complete pre-plan was developed summarizing sequence of events, time schedule, and equipment requirements
- Permit preparation and submittal
- Training of oil company personnel that would be in the area
- Asbestos abatement and follow-up testing
- Packaging and manifesting of waste

Dollar value of contract: \$250,000.00

N.O.R.M. Contaminated Site Remediation

Magnolia, Arkansas

Remediation of N.O.R.M. contaminated site resulting from discharge of oilfield waste

- Preliminary site investigation
- Cost estimate based on extent of contamination
- Develop strategy for removal of N.O.R.M. waste and subsequent backfill
- Permit application
- Submit remediation plans to State of Arkansas for discussion and approval
- Mobilize crew and equipment to site
- Excavate N.O.R.M. soil and monitor for disposal coordination
- Coordinate transportation and disposal
- Submit post-closure to state for approval

Dollar value of contract: \$1,000,000.00

Radioactive Release Monitoring and Site Decontamination

Jan. 2002

Major Refiner

Westlake, Louisiana

Accidental release of radiography source inside of a large product tank

- Emergency response after notification of release
- Preliminary site investigation to determine extent of site and personnel contamination
- Monitoring of surrounding area
- Decontamination of personnel, surrounding area, and personal transportation



- Release monitoring of site
- Documentation and correspondence with appropriate regulatory authorities

Dollar value of contract: \$3,500,000.00

Lead Abatement and Coatings Projects

Various sites - oilfield and industrial

Onshore and offshore

Mississippi, Louisiana, Texas

Projects include abatement of lead contaminated paints and blasting and coatings

- Preliminary site review and sampling as necessary
 - Provide cost estimates
 - Schedule personnel and equipment
 - Sampling, manifesting, waste coordination and scheduling for disposal
-

Leg Inspection of Offshore Platforms

Deepwater Gulf of Mexico

Project involved the entry, inspection and decontamination of various compartments prior to ABS inspection

- Coordination through engineering group
 - Preliminary site inspection
 - Preparation of safe entry procedures
 - Prepared rescue plan, including lighting and ventilation requirements
 - Entry and removal of fluids encountered and subsequent compartment decontamination and de-humidification
 - Personnel monitored third party entry during inspection
-

Dollar value of contract: \$375,000.00

NGL Gas Plant NORM Decontamination

Grand Chenier, Louisiana

Natural gas processing facility, soil around cooling tower unit contaminated with N.O.R.M.



- Preliminary site investigation
- Procedure preparation and permit application
- Personnel and equipment mobilization
- Site monitoring, both air and soil
- Waste packaging, analyzing, manifesting and coordination of transportation to disposal
- Prepare final release

Dollar value of contract: \$600,000.00

Waste Management Train Derailment
Eunice, Louisiana

Train derailment caused the release of various hazardous and non-hazardous products and subsequent contamination of the soil and water

- Evaluate the various waste streams generated from tank car spill
- Profile the waste according to characteristics and determine appropriate disposal options
- Coordinate transportation and containerization of waste
- Generate documentation for disposal and transportation
- Track waste exiting site and generate support documentation

Dollar value of contract: \$2,300,000.00

Site Remediation of Drilling Chemical Service Center
Houma, Louisiana

Drilling chemical service company elected to remediate service center soil contamination resulting from day to day facility operation

- Evaluate the various soil contaminants
- Profile the waste generated according to characteristics and determine appropriate disposal options
- Coordinate transportation and containerization of waste
- Manage the removal and load-out of waste
- Track waste exiting site and prepare final reports



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Safety Training Summary

Oilfield Services Div.
543 Renaud Road
Lafayette, LA 70507
337-233-4889

PSC is serious about safety. Our goal is to maintain an incident-free work environment. To achieve that goal, we invest more in HS&E training than any other contractor in the industry. Our safety process focuses on skill development while fostering an attitude of safety.

The process begins by hiring qualified employees and continues with comprehensive, behavioral-based safety and service line training.

Developed internally to concentrate on the specific safety challenges our workers encounter, our service line training is interactive so our people actually practice the skills as they are being taught. And our clients are assured of safe & skillful project performance.

PSC's success in the area of safety training is reflected in our statistics. **Our 2001 Incident Rate was 0.50**, an outstanding accomplishment for a contractor in this industry.

PSC's Safety Training Program

I. New Hire Orientation

- Respiratory Training – 29 CFR 1910.134
- Lockout/Tagout – 29 CFR 1910.147
- Rigger training – API RP eD 4th Edition
- Confined Space Entry – 29 CFR 1910.1200
- Personal Protective Equipment (PPE) – 29 CFR 1910.132-138
- H2S – 30 CFR 250.67

II. 24-hour HAZWOPER

- Hazcom/Hazwoper Level I – 29 CFR 1910.100/120
- Process Safety Management – 29 CFR 1910.119
- Hearing Conservation – 29 CFR 1910.95
- SEMP – RP75
- Emergency Response
- Lockout/Tagout – 29 CFR 1910.147
- Electrical Safety – 29 CFR 1910.332
- Employee Exp./Medical Records
- Hazcom/Hazwoper Level II – 29 CFR 1910.1200/120
- Welding & X-Ray – 29 CFR 1910.252
- Process Safety Management/SEMP – 29 CFR 1910.119/API RP 35
- Confined Space Entry – 29 CFR 1910.146
- Respiratory Protection – 29 CFR 1910.134
- Personal Protective Equipment – 29 CFR 1910.132
- Fall Protection/Employee Exp-Med. Rec. – 29 CFR 1926.502/503

- H2S/Hazmat Transport Aware Hm 126 F – 30 CFR 250.67/ANSI Z-390
- Lockout/Tagout/Emergency Response – 29 CFR 1910.147
- Back Safety/Work Permits/Hearing Con. – 29 CFR 1910.95
- Electrical Safety – 29 CFR 1910.332
- Offshore/ SEMP RP75 – API-T-1
- Hazcom/Hazwoper Level III – 29 CFR 1910.1200/120
- Process Safety Management – 29 CFR 1910.119
- Confined Space Entry/Electrical – 29 CFR 1910.146
- Respiratory Protection/Medical Records – 29 CFR 1910.134
- PPE – 29 CFR 1910.132
- Fall Protection/Decon – 29 CFR 1926.502/503
- Lockout/Tagout/Back Safety – 29 CFR 1910.147
- Hearing Conservation/Offshore API T 1 – 29 CFR 1910.95
- Emergency Response Plan/Fire Safety – 29 CFR 1910.120/NFPA 10
- H2S/Work Permits/Offshore – 30 CFR 250.67/ANSI Z-390
- Welding & X-Ray/SEMP RP 75 – 29 CFR 1910.252

III. Rigger Training

IV. Medic First Aid/CPR

At PSC,
we believe:

**Safety
Doesn't Cost -
It Pays.**



CERTIFICATION OF COMPLETION

This certificate is awarded to

Lenny Dupuis
Phillip Services Corporation

Completion of 8 hour Refresher Hazardous Waste Operation and Emergency Response

Bryan H. Benoit

Signature

01/02/2003

Date

Lenny Dupuis

Signature

01/02/2003

Date

Omega Alliance, Inc.

Certificate

This certifies that Don Merle Devine, 5071 has
successfully completed the

24hr HAZWOPER TRAINING CFR 1910.120(e)

*Health and Safety Training Program
for Hazardous Waste Operations.*

*According To Existing
Federal Standards*





Omega Representative Date 12/03/00

HOUSTON AREA CONTRACTORS' SAFETY COUNCIL, INC.
TRAINING CERTIFICATE

This is to certify that

DON DEVINE

has successfully completed the mandatory subject matter for

8 Hour Refresher Hazwoper Training 29 CFR 1910.120 (e)(8)

on this 22ND day of APRIL 2002




JESSE DEHOYOS- Instructor



Respirator Fit Test Report

Test Date: 03/26/03		Fit Test Expires: 03/26/04	
Name: Don Merle Devine		License# 427925071	State: La
		SS # 427-92-5071	
Address: 21259 Frontage Rd			
City: Iowa		State: La	Zip: 70611
Respirator Type: (Check One)	½ Face Negative Pressure	Full Face Negative Pressure X	PAPR
Manufacturer: 3M	Model Number: 6800	Size: Large	
Cartridge Type Tested: Organic Vapor/Acid Gas /P100			
Restrictions: none			

Test

Type of Test: (Check)	Quantitative		X Qualitative	
	Test Device:		Isoamyl Acetate X Saccharin Bitrex Irritant Smoke	
Results:	Pass	Fail	Pass X	Fail
Test Given By: Anna Myers		Test Subject: Don Devine		

Don Merle Devine
21259 South Frontage Road Lot # 2
Iowa, La. 70611
Cell: 281-413-0840 Home: 337-582-7295

QUALIFICATIONS

Safety: Safety Coordinator and Supervisor on construction sites [OSHA]. Set up and enforced MSHA safety program in strip mining [sand & gravel] operation.

Supervision: Project Superintendent [environmental remediation], Pipe Fitter Foreman, Plant Foreman [sand & gravel], Plant Supt. [sand & gravel], Equipment Foreman [civil constr.]

Equipment operator: excavator, compactors, back hoe, dozer, front end loader, drag line, scraper, motor grader, cherry picker, off road haul trucks, dump trucks [tandem and trailer] fork lift

WORK HISTORY

10/01 - present **Project Superintendent Gulf Services LTD Pasadena, Tx.**
(281) 991-0004 **Shane Leonard, VP / West Lake, La. (337) 439-6700 Mike Pacheco VP**
Assisted Project Manager with bid preparation, planned and scheduled all phases of the job to include equipment, labor and materials. Provided onsite coordination of work force, sub contractors, and home office. Ensured assigned projects are completed on or ahead of schedule, within budget, meets safety standards and all required paper work is accurate and complete. Also operated various equipment on projects.

5/4/01 - 10/01 **Equipment operator Encompass Electrical Technologies**
underground utility installation at George Bush Intercontinental Airport, Houston

12/7/00 - 5/1/01 **Equipment operator Coastal Bend Services Highlands, Tx.**
(281) 426 - 3592
Crew leader and operated dozer, trackhoe, front end loader and compactor in environmental soil remediation

1/5/99 - 11/10/00 **Plant Foreman Dickerson & Bowen Gravel (601) 684 - 7033**
Supervised erection and start up of new sand and gravel screening plants. Hired new employees and trained them in plant and equipment operations. Also trained office personnel in sales, cash sales, weighing trucks and dispatching trucks for deliveries and daily book keeping. Worked with Safety Supervisor in setting up new safety training program per MSHA Regulations. Worked closely with contractors to supply needed specification materials.

Duties included: Daily time sheets, daily sales and production reports, daily safety inspections, Weekly Safety meetings, parts and equipment ordering, price quotes on materials for customers, safety orientation / training of new employees.

Associated computer skills: Windows 98. Microsoft works - set up safety training program and safety tests for employees, graphs and charts showing production, and reservoir water levels, employee profiles and daily equipment safety inspections

1/90 - 10/98 **Worked shut downs for various companies**
Fluor Daniels --- Pipe Fitter and Pipe Fitter Foreman
US Contractors --- Pipe Fitter Foreman and Equip. Operator
Brown & Root --- Boiler Maker / Pipe Fitter
Willis & Paul Group --- Concrete Batch Plant Operator [Lone Star Industries, Oglesby, Il.]

11/20/89 - 12/21/89 **Safety Supervisor CBI Co. Ltd. Hess Oil, St. Croix, USVI**
Enforcement of company, customer and OSHA safety regulations and filing necessary reports, during shut down.

9/25/89 - 11/13/89 **Safety Supervisor CBI NaCon Amerada Hess Corp., Purvis, Ms.**
same as above

7/88 - 9/21/89 **Warehouseman & Safety Coordinator CBI NaCon Weyerhaeuser Paper Mill, Columbus, Ms.**
same as above, PLUS: supervised receiving and off loading of freight trucks, expediting materials to project foremen, managed tool rooms, operated crane, dozer, motor grader and fork lift. Training and certifying equipment operators.

Also on this project, I was a member of the project wide SAFETY MANAGEMENT ACTIVITY REPORTING TEAM. This team was composed of Safety personnel from all the contractors on the project. As a team we would tour the whole project and make notes on safety violations we observed. Then we discussed them and planned ways to educate employees about such hazards.

10/12/71 - 6/88 **Riverside Gravel Co. McComb, Ms. (601-684-7033) Laborer to Plant Supt.**

Started as a laborer with a shovel in my hand. Through the years there I learned how to operate all types of heavy equipment and to drive trucks. In 1976 I was given my first Foreman's job at temporary plants set to supply material for road construction. In 1978 I was made Plant Foreman at a new permanent plant sight in Columbia, Ms. and in 1985 was promoted to Plant Supt.

EDUCATION

High School Diploma - North Pike High School - 1974
Field Engineering I & II, Basic Blueprint Reading, & Millwright I - Project Training Classes at Weyerhaeuser Paper Mill Project
MSHA Safety Training & Educating - Copiah/Lincoln College 1977

LICENSES & CERTIFICATES

Class A CDL, OSHA 40 hour HAZWOPER

PERSONAL REFERENCES

- | | | |
|--------------------|-----------------|------------------|
| • Glen Fortenberry | McComb, Ms. | [601] 249 - 3356 |
| • J. E. Storment | Lafayette, La. | [337] 234 - 3573 |
| • Mike Parker | Brookhaven, Ms. | [601] 835 - 1341 |
| • Lenny Dupuis | Iowa, La. | [713] 854 - 6626 |

Medical Examination Report FOR COMMERCIAL DRIVER FITNESS DETERMINATION

1. DRIVER'S INFORMATION										Driver completes this section.																								
Driver's Name (Last, First, Middle)					Social Security No.					Birthdate		Age		Sex		New Certification			Date of Exam															
														<input checked="" type="checkbox"/> M <input type="checkbox"/> F		<input checked="" type="checkbox"/> New <input type="checkbox"/> Recertification <input type="checkbox"/> Follow Up																		
DEVINE DON					427925071					10/12/56		46		<input checked="" type="checkbox"/> M <input type="checkbox"/> F		<input checked="" type="checkbox"/> New <input type="checkbox"/> Recertification <input type="checkbox"/> Follow Up			11/25/07															
Address					City, State, Zip Code					Work Tel:					Driver License No.					License Class					State of Issue									
1162 Highway					McComb MS 39648										(822) 216-0749					427925071					<input checked="" type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> Other					MS				
98 East																																		

2. HEALTH HISTORY		Driver completes this section, but medical examiner is encouraged to discuss with driver.	
Yes	No	Yes	No
<input type="checkbox"/>	<input checked="" type="checkbox"/> Any illness or injury in last 5 years?	<input type="checkbox"/>	<input checked="" type="checkbox"/> Fainting, dizziness
<input type="checkbox"/>	<input checked="" type="checkbox"/> Head/Brain injuries, disorders or illnesses	<input type="checkbox"/>	<input checked="" type="checkbox"/> Sleep disorders; pauses in breathing while asleep, daytime sleepiness, loud snoring
<input type="checkbox"/>	<input checked="" type="checkbox"/> Seizures, epilepsy <input type="checkbox"/> medication _____	<input type="checkbox"/>	<input checked="" type="checkbox"/> Stroke or paralysis
<input type="checkbox"/>	<input checked="" type="checkbox"/> Eye disorders or impaired vision (except corrective lenses)	<input type="checkbox"/>	<input checked="" type="checkbox"/> Missing or impaired hand, arm, foot, leg, finger, toe
<input type="checkbox"/>	<input checked="" type="checkbox"/> Ear disorders, loss of hearing or balance	<input type="checkbox"/>	<input checked="" type="checkbox"/> Spinal injury or disease
<input type="checkbox"/>	<input checked="" type="checkbox"/> Heart disease or heart attack; other cardiovascular condition <input type="checkbox"/> medication _____	<input type="checkbox"/>	<input checked="" type="checkbox"/> Chronic low back pain
<input type="checkbox"/>	<input checked="" type="checkbox"/> Heart surgery (valve replacement/bypass, angioplasty, pacemaker)	<input type="checkbox"/>	<input type="checkbox"/> Regular, frequent alcohol use
<input type="checkbox"/>	<input checked="" type="checkbox"/> High blood pressure <input type="checkbox"/> medication _____	<input type="checkbox"/>	<input checked="" type="checkbox"/> Narcotic or habit forming drug use
<input type="checkbox"/>	<input checked="" type="checkbox"/> Muscular disease		
<input type="checkbox"/>	<input checked="" type="checkbox"/> Shortness of breath		
		<input type="checkbox"/>	<input type="checkbox"/> Lung disease, emphysema, asthma, chronic bronchitis
		<input type="checkbox"/>	<input checked="" type="checkbox"/> Kidney disease, dialysis
		<input type="checkbox"/>	<input checked="" type="checkbox"/> Liver disease
		<input type="checkbox"/>	<input checked="" type="checkbox"/> Digestive problems
		<input type="checkbox"/>	<input checked="" type="checkbox"/> Diabetes or elevated blood sugar controlled by: <input type="checkbox"/> diet <input type="checkbox"/> pills <input type="checkbox"/> insulin
		<input type="checkbox"/>	<input checked="" type="checkbox"/> Nervous or psychiatric disorders, e.g., severe depression
		<input type="checkbox"/>	<input type="checkbox"/> medication _____ <input checked="" type="checkbox"/> Loss of, or altered consciousness

☐ Shortness of breath

For any YES answer, indicate onset date, diagnosis, treating physician's name and address, and any current limitation. List all medications (including over-the-counter medications) used regularly or recently.

I certify that the above information is complete and true. I understand that inaccurate, false or missing information may invalidate the examination and my Medical Examiner's Certificate.

Driver's Signature

Medical Examiner's Comments on Health History (The medical examiner must review and discuss with the driver any "yes" answers and potential hazards of medications, including over-the-counter medications, while driving.)

medications, including over-the-counter medications, while driving.)

① Pt. Advised not to drink EtOH + D-wood - reports 1-2 drinks/day

TESTING (Medical Examiner completes Section 3 through 7)

3. VISION

Standard: At least 20/40 acuity (Snellen) in each eye with or without correction. At least 70° peripheral in horizontal meridian measured in each eye. The use of corrective lenses should be noted on the Medical Examiner's Certificate.

INSTRUCTIONS: When other than the Snellen chart is used, give test results in Snellen-comparable values. In recording distance vision, use 20 feet as normal. Report visual acuity as a ratio with 20 as numerator and the smallest type read at 20 feet as denominator. If the applicant wears corrective lenses, these should be worn while visual acuity is being tested. If the driver habitually wears contact lenses, or intends to do so while driving, sufficient evidence of good tolerance and adaptation to their use must be obvious. Monocular drivers are not qualified.

Numerical readings must be provided.

ACUITY	UNCORRECTED	CORRECTED	HORIZONTAL FIELD OF VISION
Right Eye	20/20	20/	Right Eye 85°
Left Eye	20/25	20/	Left Eye 70°
Both Eyes	20/20	20/	

Complete next line only if vision testing is done by an ophthalmologist or optometrist

Applicant can recognize and distinguish among traffic control signals and devices showing standard red, green and amber colors?

Applicant meets visual acuity requirement only when wearing:

☐ Corrective Lenses

Monocular Vision: ☐ Yes ☒ No

☒ Yes ☐ No

Date of Examination

Name of Ophthalmologist or Optometrist (print)

Tel. No.

License No./State of Issue

Signature

Standard: a) Must first perceive forced whispered voice ≥ 5 ft., with or without hearing aid, or b) average hearing loss in better ear ≤ 40 dB

4. HEARING

☐ Check if hearing aid used for tests. ☐ Check if hearing aid required to meet standard.

INSTRUCTIONS: To convert audiometric test results from ISO to ANSI, -14 dB from ISO for 500 Hz, -10 dB for 1,000 Hz, -8.5 dB for 2,000 Hz. To average, add the readings for 3 frequencies tested and divide by 3.

Numerical readings must be recorded.

a) Record distance from individual at which forced whispered voice can first be heard.	Right Ear 10' Feet	Left Ear 6' Feet
--	--------------------	------------------

b) If audiometer is used, record hearing loss in decibels, (acc. to ANSI Z24.5-1951)	Right Ear			Left Ear		
	500 Hz	1000 Hz	2000 Hz	500 Hz	1000 Hz	2000 Hz
	Average:			Average:		

5. BLOOD PRESSURE/PULSE RATE

Numerical readings must be recorded.

Blood Pressure	Systolic 130	Diastolic 82
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Driver qualified if $\leq 160/90$ on initial exam.

Pulse Rate	<input checked="" type="checkbox"/> Regular <input type="checkbox"/> Irregular
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GUIDELINES FOR BLOOD PRESSURE EVALUATION

On initial exam

If 161-180 and/or 91-104, qualify 3 mos. only.

If > 180 and/or 104, not qualified until reduced to $< 161/105$. Then qualify for 3 mos. only.

Within 3 months

If ≤ 160 and/or 90, qualify for 1 yr. Document Rx & control the 3rd month.

If ≤ 160 and/or 90, qualify for 6 mos. Document Rx & control the 3rd month.

Certify

Annually if acceptable BP is maintained

Biannually

Medical examiner should take at least 2 readings to confirm blood pressure.

Numerical readings must be recorded.

6. LABORATORY AND OTHER TEST FINDINGS

Urinalysis is required. Protein, blood or sugar in the urine may be an indication for further testing to rule out any underlying medical problem.

Other Testing (Describe and record)

URINE SPECIMEN	SP. GR. 1.010	PROTEIN	BLOOD	SUGAR
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7. PHYSICAL EXAMINATION

Height: 20" (in.) Weight: 192 (lbs.)

The presence of a certain condition may not necessarily disqualify a driver, particularly if the condition is controlled adequately, is not likely to worsen or is readily amenable to treatment. Even if a condition does not disqualify a driver, the medical examiner may consider deferring the driver temporarily. Also, the driver should be advised to take the necessary steps to correct the condition as soon as possible particularly if the condition, if neglected, could result in more serious illness that might affect driving.

Check YES if there are any abnormalities. Check NO if the body system is normal. Discuss any YES answers in detail in the space below, and indicate whether it would affect the driver's ability to operate a commercial motor vehicle safely. Enter applicable item number before each comment. If organic disease is present, note that it has been compensated for.

See *Instructions to the Medical Examiner for guidance.*

BODY SYSTEM	CHECK FOR:	YES*	NO	BODY SYSTEM	CHECK FOR:	YES*	NO
1. General Appearance	Marked overweight, tremor, signs of alcoholism, problem drinking, or drug abuse.		✓	7. Abdomen and Viscera	Enlarged liver, enlarged spleen, masses, bruits, hernia, significant abdominal wall muscle weakness.		✓
2. Eyes	Pupillary equality, reaction to light, accommodation, ocular motility, ocular muscle imbalance, extraocular movement, nystagmus, exophthalmos, strabismus uncorrected by corrective lenses, retinopathy, cataracts, aphakia, glaucoma, macular degeneration.		✓	8. Vascular System	Abnormal pulse and amplitude, carotid or arterial bruits, varicose veins.		✓
3. Ears	Middle ear disease, occlusion of external canal, perforated eardrums.		✓	9. Genito-urinary System	Hernias.		✓
4. Mouth and Throat	Irremediable deformities likely to interfere with breathing or swallowing.		✓	10. Extremities - Limb	Loss or impairment of leg, foot, toe, arm, hand, finger. Perceptible limp, deformities, atrophy, weakness, paralysis, clubbing, edema, hypotonia. Insufficient grasp and prehension in upper limb to maintain steering wheel grip. Insufficient mobility and strength in lower limb to operate pedals properly.		✓
5. Heart	Murmurs, extra sounds, enlarged heart, pacemaker.		✓	11. Spine, other musculoskeletal	Previous surgery, deformities, limitation of motion, tenderness.		✓
6. Lungs and chest, not including breast examination.	Abnormal chest wall expansion, abnormal respiratory rate, abnormal breath sounds including wheezes or alveolar rales, impaired respiratory function, dyspnea, cyanosis. Abnormal findings on physical exam may require further testing such as pulmonary tests and/or xray of chest.		✓	12. Neurological	Impaired equilibrium, coordination or speech pattern; paresthesia, asymmetric deep tendon reflexes, sensory or positional abnormalities, abnormal patellar and Babinski's reflexes, ataxia.		✓

*COMMENTS:

Note certification status here. See *Instructions to the Medical Examiner* for guidance.

☒ Meets standards in 49 CFR 391.41; qualifies for 2 year certificate

☐ Does not meet standards

☐ Meets standards, but periodic evaluation required

Due to _____ driver qualified only for:

☐ 3 months ☐ 1 year

☐ 6 months ☐ Other

☐ Temporarily disqualified due to (condition or medication): _____

Return to medical examiner's office for follow up on _____

If meets standards, complete a Medical Examiner's Certificate according to 49 CFR 391.43(h). (Driver must carry certificate while operating a commercial vehicle.)

☐ Wearing corrective lenses

☐ Wearing hearing aid

☐ Accompanied by a _____ waiver/exemption

☐ Skill Performance Evaluation (SPE) Certificate

☐ Driving within an exempt intracity zone

☐ Qualified by operation of 49 CFR 391.41

Medical Examiner's Signature _____

Medical Examiner's Name (print) _____

Address _____

Telephone Number _____

299 Cities Service Hwy.

Sulphur, LA 70663

(337) 626-1011

CERTIFICATE OF TRAINING

To acknowledge the completion of

HAZWOPER 40 hour classroom training

WILLIS F. BRELAND

Student's Name

Has completed this course on

January 09, 2003

STRANCO INC.

Company Name

Gregory S. Meyers

Instructor's Name/Signature



Respirator Fit Test Report

Test Date: 01/09/03		Fit Test Expires: 01/09/04	
Name: Willis Breland		License# 003362611	State: La
		SS # 437-31-2058	
Address: 69445 4 th Avenue			
City: Covington		State: La	Zip: 70433
Respirator Type: (Check One)	½ Face Negative Pressure	Full Face Negative Pressure X	PAPR
Manufacturer: 3M	Model Number: 6800	Size: Large	
Cartridge Type Tested: Organic Vapor/Acid Gas /P100			
Restrictions: none			

Test

Type of Test: (Check)	Quantitative		X Qualitative	
	Test Device:		Isoamyl Acetate X Saccharin Bitrex Irritant Smoke	
Results:	Pass	Fail	Pass X	Fail
Test Given By: Anna Myers		Test Subject: Willis Breland		

CERTIFICATE OF TRAINING

To acknowledge the completion of

HAZWOPER 40 hour classroom training

ISREAL HAMMOND

Student's Name

Has completed this course on

January 09, 2003

STRANCO INC.

Company Name

Anna M. G. Hammond

Instructor's Name/Signature



Respirator Fit Test Report

Test Date: 01/09/03		Fit Test Expires: 01/09/04	
Name: Isreal Hammond		License# 001380362	State: La
		SS # 423-62-0997	
Address: P.O. Box 974			
City: Lacombe		State: La	Zip: 70445
Respirator Type: (Check One)	<input type="checkbox"/> ½ Face Negative Pressure	<input checked="" type="checkbox"/> Full Face Negative Pressure	<input type="checkbox"/> PAPR
Manufacturer: 3M	Model Number: 6800	Size: Large	
Cartridge Type Tested: Organic Vapor/Acid Gas /P100			
Restrictions: none			

Test

Type of Test: (Check)	Quantitative		<input checked="" type="checkbox"/> Qualitative	
	Test Device:		Isoamyl Acetate <input checked="" type="checkbox"/> Saccharin Bitrex Irritant Smoke	
Results:	Pass	Fail	Pass <input checked="" type="checkbox"/>	Fail
Test Given By: Anna Myers		Test Subject: Isreal Hammond		



Respirator Fit Test Report

Test Date: 03/26/03		Fit Test Expires: 03/26/04	
Name: Timothy J. Mann		License#	State: La
		SS # 265-23-2395	
Address: 70459 Highway 59			
City: Abita Springs		State: La	Zip: 70420
Respirator Type: (Check One)	½ Face Negative Pressure	Full Face Negative Pressure X	PAPR
Manufacturer: 3M	Model Number: 6800	Size: Large	
Cartridge Type Tested: Organic Vapor/Acid Gas /P100			
Restrictions: none			

Test

Type of Test: (Check)	Quantitative		x Qualitative	
	Test Device:		Isoamyl Acetate X Saccharin Bitrex Irritant Smoke	
Results:	Pass	Fail	Pass x	Fail
Test Given By: Anna Myers		Test Subject: Timothy Mann		



Respirator Fit Test Report

Test Date: 03/26/03		Fit Test Expires: 03/26/04	
Name: William P. Strain		License# 004000292	State: La
		SS # 437-33-5109	
Address: 70459 Highway 59			
City: Abita Springs		State: La	Zip: 70420
Respirator Type: (Check One)	<input type="checkbox"/> ½ Face Negative Pressure	<input checked="" type="checkbox"/> Full Face Negative Pressure	<input type="checkbox"/> PAPR
Manufacturer: 3M	Model Number: 6800	Size: Large	
Cartridge Type Tested: Organic Vapor/Acid Gas /P100			
Restrictions: none			

Test

Type of Test: (Check)	Quantitative		<input checked="" type="checkbox"/> Qualitative	
	Test Device:		Isoamyl Acetate <input checked="" type="checkbox"/> Saccharin Bitrex Irritant Smoke	
Results:	Pass	Fail	Pass <input checked="" type="checkbox"/>	Fail
Test Given By: Anna Myers		Test Subject: William P. Strain		

CERTIFICATE OF TRAINING

To acknowledge the completion of

HAZWOPER 40 hour classroom training

Paul Lynn Guidry

Student's Name

Has completed this course on

03/25/03

Date

Stranco Inc.

Company Name

Anna Myers

Instructor's Name/Signature



Respirator Fit Test Report

Test Date: 03/26/03		Fit Test Expires: 03/26/04	
Name: Paul Lynn Guidry		License# 00303466	State: La
		SS # 434-06-7751	
Address: 13490 Pousson Rd.			
City: Iowa		State: La	Zip: 70647
Respirator Type: (Check One)	½ Face Negative Pressure	Full Face Negative Pressure X	PAPR
Manufacturer: 3M		Model Number: 6800	Size: Large
Cartridge Type Tested: Organic Vapor/Acid Gas /P100			
Restrictions: none			

Test

Type of Test: (Check)	Quantitative		X Qualitative	
	Test Device:		Isoamyl Acetate X Saccharin Bitrex Irritant Smoke	
Results:	Pass	Fail	Pass X	Fail
Test Given By: Anna Myers		Test Subject: Paul Guidry		



“one source, smarter solutions”

Certificate of Insurance

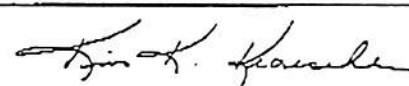
PRODUCER Aon Risk Services of Texas, Inc. 1330 Post Oak Blvd Suite 900 Houston, TX 77056 LG		THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.	
JRED PSC Industrial Outsourcing, Inc. DBA Philip Services/Louisiana, Inc. 543 Renaud Acadiana Region Lafayette, LA 70507 A Wholly-Owned Subsidiary of Philip Services Corporation		INSURERS AFFORDING COVERAGE	
		INSURER A:	Commerce & Industry Ins Co
		INSURER B:	Lumbermens Mutual Casualty Co.
		INSURER C:	Steadfast Insurance Company
		INSURER D:	American International Specialty Lines Co
		INSURER E:	

COVERAGES

THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED, NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN. THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS, AND CONDITIONS OF SUCH POLICIES. THE LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

CO LTR	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YYYY)	POLICY EXPIRATION DATE (MM/DD/YYYY)	LIMITS
A	GENERAL LIABILITY <input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS MADE <input checked="" type="checkbox"/> OCCURRENCE <input checked="" type="checkbox"/> CONTRACTUAL LIABILITY <input checked="" type="checkbox"/> Owners Protective Liability <input checked="" type="checkbox"/> SIR \$1,000,000	GL 4177375	10/31/2002	10/31/2003	GENERAL AGGREGATE \$ 4,000,000 PRODUCTS - COMP/OP AGG \$ 2,000,000 PERSONAL & ADV INJURY \$ 2,000,000 EACH OCCURRENCE \$ 2,000,000 FIRE DAMAGE (Any One Fire) \$ 2,000,000 MED EXP (Any One Person) \$ 10,000
B	AUTOMOBILE LIABILITY <input checked="" type="checkbox"/> ANY AUTO <input type="checkbox"/> ALL OWNED AUTOS <input type="checkbox"/> SCHEDULED AUTOS <input checked="" type="checkbox"/> HIRED AUTOS <input checked="" type="checkbox"/> NON-OWNED AUTOS <input checked="" type="checkbox"/> MCS 90 <input type="checkbox"/>	F5D05604101 (AOS) F5D05604201 (TX) F5D05604301 (VA) F5D05604401 (HI)	10/31/2002	10/31/2003	COMBINED SINGLE LIMIT \$ 2,000,000 BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE \$
	GARAGE LIABILITY <input type="checkbox"/> ANY AUTO				AUTO ONLY - EA ACCIDENT \$ OTHER THAN AUTO ONLY: \$ EACH ACCIDENT \$ AGGREGATE \$
C	EXCESS LIABILITY <input checked="" type="checkbox"/> UMBRELLA FORM <input type="checkbox"/> OTHER THAN UMBRELLA FORM	EOG930709700	10/31/2002	10/31/2003	EACH OCCURRENCE \$ 5,000,000 AGGREGATE \$ 5,000,000 SIR \$ 10,000
B	WORKERS' COMPENSATION AND EMPLOYERS' LIABILITY THE PROPRIETOR/PARTNERS/EXECUTIVE OFFICERS ARE:	5BA16815300 (AOS) 5BA16815400 (AZ & LA) 5BA16815500 (Wisconsin) 5SC04125703 (WA & OH)	10/31/2002	10/31/2003	<input checked="" type="checkbox"/> WC STATUTORY LIMITS OTHER E.L. EACH ACCIDENT \$ 1,000,000 E.L. DISEASE - POLICY LIMIT \$ 1,000,000 E.L. DISEASE - EA EMPLOYEE \$ 1,000,000
D	OTHER Contractors Pollution Liability	COPS6192423	10/31/2002	10/31/2003	Per Occurrence \$5,000,000 Aggregate \$5,000,000 \$100,000
B	Cargo Legal Liability	F5D05604101	10/31/2002	10/31/2003	

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/RESTRICTIONS/SPECIAL ITEMS Philip / PSLafay / 22240
MICHAEL PISANI & ASSOCIATES, INC. IS ADDED AS ADDITIONAL INSURED (EXCEPT FOR WORKERS' COMPENSATION) AND WAIVER OF SUBROGATION AS REQUIRED BY WRITTEN CONTRACT AS ALLOWED BY STATE LAW BUT LIMITED TO THE OPERATIONS OF THE INSURED UNDER SAID CONTRACT AND ALWAYS SUBJECT TO POLICY TERMS, CONDITIONS AND EXCLUSIONS. WAIVER OF SUBROGATION DOES NOT APPLY TO THE STATE OF CALIFORNIA, KENTUCKY AND TEXAS, BUT IS APPLIED ON A PER HOLDER BASIS. CANCELLATION PROVISION SHOWN IS SUBJECT TO SHORTER TIME PERIODS DEPENDING ON THE JURISDICTION OF, AND REASON FOR, THE CANCELLATION.

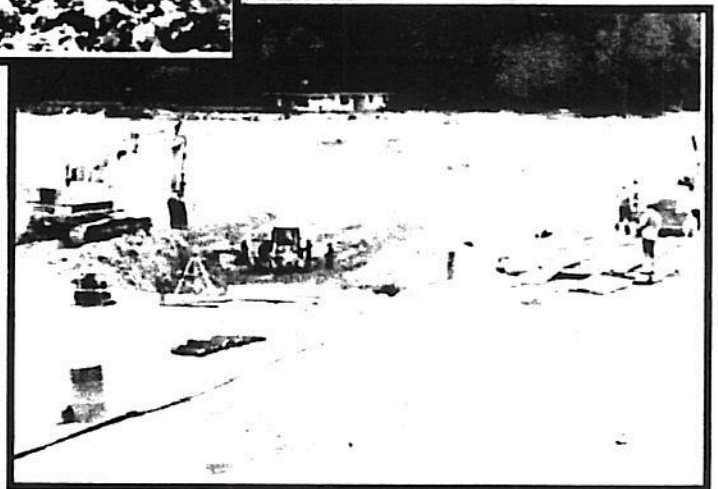
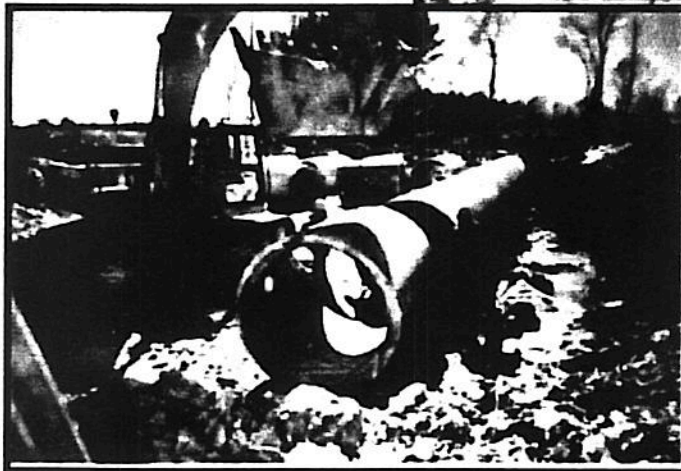
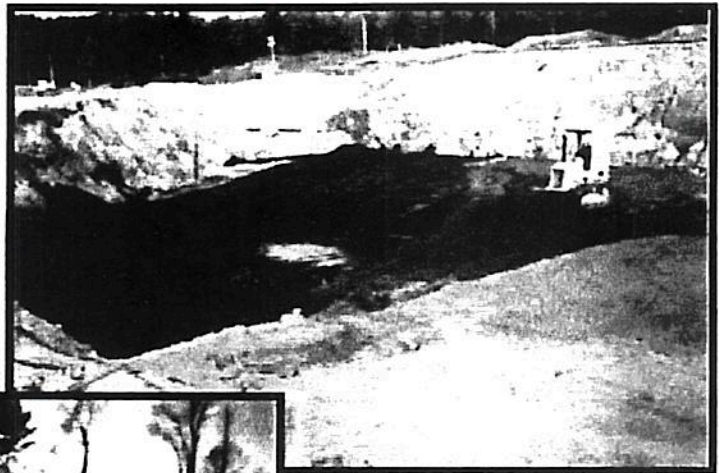
CERTIFICATE HOLDER Michael Pisani & Associates, Inc. 1430 Energy Centre 1100 Poydras Street New Orleans, LA 70163	CANCELLATION SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING COMPANY WILL ENDEAVOR TO MAIL 30 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO MAIL SUCH NOTICE SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE COMPANY, ITS AGENTS OR REPRESENTATIVES. AUTHORIZED REPRESENTATIVE 
--	--

ACORD 25-1 (1/95)

Received - The Mar. 24. 8:01PM

STRANCO, INC.

STATEMENT OF QUALIFICATIONS



WASTE TRANSPORTATION, ENVIRONMENTAL REMEDIATION, AND CONSTRUCTION SERVICES

Statement of Qualifications

**Hazardous and Non-Hazardous Waste Transportation & Disposal
Environmental Remediation
Construction Services**

STRANCO, INC.

TABLE OF CONTENTS

1.0	Introduction	1
1.1	Company History	1
1.2	Equipment Resources	1
1.3	Bonding and Insurance	2
2.0	Services	2
2.1	Transportation and Disposal of Hazardous and Non-hazardous waste	3
2.2	Contaminated Soil Excavation and Hazardous Materials Handling	3
2.3	Contaminated Soil and Sludge Treatment	3
2.4	Repository Construction, Capping, and Containment	4
2.5	Civil Construction	4
2.6	Slurry and Reactive Wall Systems	5
2.7	Volume Reduction	5
3.0	Health & Safety Program	5
3.1	Organization and Responsibilities	5
3.2	Training	6
3.3	Work Site and Project Controls	6
3.3.1	Site-Specific Health and Safety Plan	6
3.3.2	Zero-Exposure Work Place	6
3.3.3	Inspections and Safety Meetings	6
3.4	Accident Prevention Program	7
3.4.1	Reporting and Investigation	7
3.4.2	Expedient Return to Work Program	7
3.4.3	Drug and Alcohol Free Work Place	7
4.0	Project Management Approach	7
4.1	Project Team	8
4.2	Cost Control	8
4.3	Quality Control	8
4.3.1	Quality Management System	8
4.3.2	Quality Improvement	9

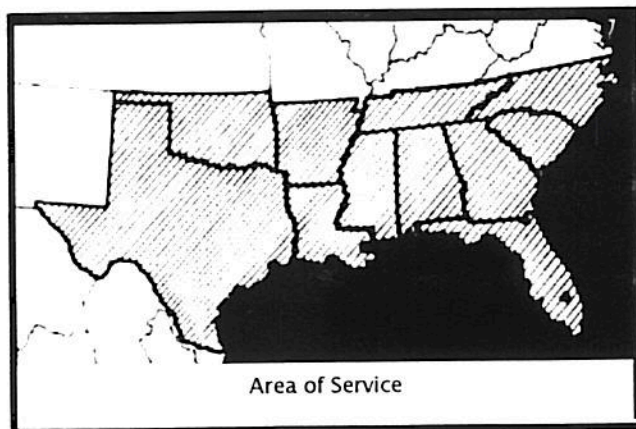
Statement of Qualifications

4.3.3	Documents and Records	9
4.3.4	Design	9
4.3.5	Standard Operating Procedures	9
4.3.6	Procurement	9
4.3.7	Inspection, Tests, and Assessments	9
5.0	Project Experience	9
	Major Railroad – Derailment, Louisiana	10
	Closure of Wood Products Facility, Alabama	11
	Major Chemicals Manufacturer, Mississippi	12
	Major Railroad, Emergency Response, Louisiana	12
	Major Railroad, Louisiana	12
	Major Tire Manufacturer, Alabama	13
	Equipment Manufacturer, Louisiana	13
	Pesticide Remediation of a large Farm, Louisiana	13
	Major Railroad, Emergency Response, Mississippi	13
	Major Railroad, Emergency Response, Mississippi	13
	Battery Manufacturer, Texas	14
	Major Refinery, Louisiana	14
	Major Railroad, Emergency Response, Arkansas	14
	Chemical Plant, Louisiana	15
6.0	Additional Project Experience and Client Contacts	16

1.0 Introduction

Stranco Inc. is a multidisciplinary waste transportation, civil construction, and environmental remediation company dedicated to providing cost-effective, quality services to both private and public sector clients. Stranco is fully licensed and permitted to perform remediation, construction and transportation operations.

Many of our customers have indicated complete satisfaction with our services over the years. Over forty percent of our business is repeat business from our growing list of clientele. The company was founded, and continues to strive to ensure that the Client understands that we regard each customer as a long-term partner in discovering new ways to utilize our service and competencies.



1.1 Company History

Stranco, Inc. has been in operation since 1982. Since initiating operations, Stranco has successfully completed over 200 projects in the states of Alabama, Arkansas, Georgia, Florida, Louisiana, Mississippi, Tennessee, and Texas.

Stranco has full authority and permits to perform remediation operations and transportation in these and many other states.

Completed projects range up to millions of dollars involving work from the simple to extremely complex multi-task jobs. Many of Stranco's customers have indicated satisfaction with the services provided. Over forty percent of the company's work is derived from repeat business from previous customers.

1.2 Equipment Resources

Stranco owns a wide variety of specialized and heavy equipment to complete environmental remediation, demolition, and civil construction projects including:

- Excavators with attachments
- Wheel Loaders
- Bulldozers
- Motor graders
- Tractor/trailer end dumps and tankers
- Roll-off boxes and rail trailers
- Compaction equipment
- Air Compressors
- Concrete Saw
- Portable Scales
- 3 - 6 inch Pumps

In addition, Stranco maintains an inventory of support vehicles including lube trucks, mechanic trucks, pickups, and trailers to keep the equipment maintained and productive. Each project is evaluated during the bid process to determine the most cost-effective approach to meeting equipment requirements. Stranco's

financial strength allows the company to either supply owned equipment, or to rent, lease, and/or purchase new equipment as project requirements dictate.

1.3 Bonding and Insurance

Stranco, Inc. has the capability of providing certain financial warranties to meet customer requirements. Performance Bonding is the most common form of such warranties. With our significant financial position and based on the experience and competency of our personnel, performance bonding can be provided through:

- ✓ Treasury listed and rated companies
- ✓ Corporate Surety bonding companies
- ✓ Letter of Credit

Stranco has a comprehensive insurance program that covers all operations. Insurance is provided primarily by Greenwich Insurance Company through ICT Group, LLC. Stranco's past performance and continuing relationship with ICT allows the flexibility to modify coverage on a project-specific basis. Stranco's standard insurance coverage is in the occurrence form with limits as follows:

- ❖ General Liability: \$1 million per occurrence, \$2 million aggregate
- ❖ Pollution Liability: \$1 million per occurrence
- ❖ Auto Liability: \$1 million per occurrence
- ❖ Employer's Liability: \$1 million per occurrence
- ❖ Excess Liability: \$4 million per occurrence

2.0 Services

Implementing a combination of experienced professional management and staff, Stranco will provide an integrated system of civil and environmental services to meet customer needs for a wide variety of projects.



The Stranco team will provide the customer with a cost-efficient technical approach, and the equipment and other resources necessary to implement the following and other services.

- Surface impoundment closures
- Contaminated soil removal / transportation and disposal
- Waste removal / transportation and disposal
- Sludge and soil stabilization / solidification
- Sludge volume reduction / dewatering
- Civil construction
- Land Clearing / Grubbing and site preparations
- Geo-construction, Caps, Liners and Covers

Statement of Qualifications

Stranco's goal is to develop long-term partnerships with our customers that help them to operate more efficiently and profitably. By accessing Stranco's multiple service capabilities, our clients:

- reduce the costs and administrative requirements of managing multiple vendors
- access expertise and technology that saves them time and improves their operating efficiencies
- benefit from our commitment to safety and environmental excellence
- profit from our commitment to delivering quality and tangible results that improve their competitive advantage. Stranco's goal is to provide our customer with value-added solutions derived from its project experience. The following sections highlight Stranco's core service areas.

2.1 Transportation and Disposal of Hazardous and Non-hazardous waste

- Solid waste
- Liquid waste
- End-dumps, tankers, and roll-off box capabilities

Stranco owns and operates a fleet of over thirty late-model tractor/trailers that are maintained to a standard of excellence that meets or exceeds all DOT regulations. The company is licensed and permitted to transport both hazardous and non-hazardous materials in solid, liquid, or semi-solid state. Its equipment is capable of a variety of applications, because of its selection of end-dump, tanker, and rail trailers. Additionally, Stranco can also provide

on site temporary storage of waste materials in roll-off boxes and mobile tanks.

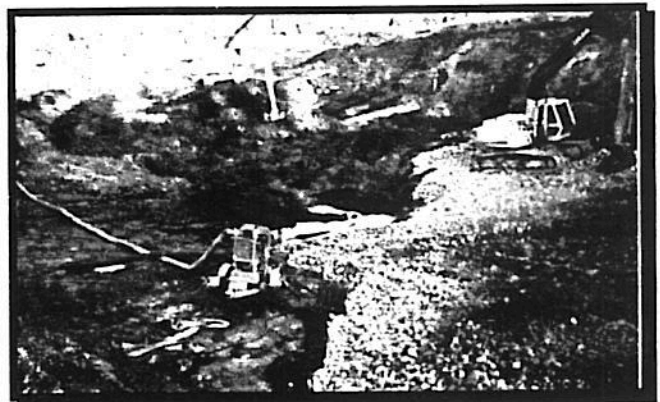
2.2 Contaminated Soil Excavation and Hazardous Materials Handling



- Excavation and disposal of contaminated soils
- Sediment removal and treatment
- Residential soil removal

2.3 Contaminated Soil and Sludge Treatment

- Solidification
- Fixation/stabilization
- pH adjustment
- Desiccation



Stranco works with the Client to develop a cost effective means to treat contaminated soil and sludge to minimize current and future costs, while ensuring regulatory compliance. Stranco continues to monitor, develop, and perfect new and innovative technical approaches in the treatment of these materials to ensure the Client of a best value for its needs and requirements.

2.4 Repository Construction, Capping, and Containment

- RCRA impoundment construction
- Landfill construction and closure
- Geomembrane-system installation
- Construction of leachate collection systems
- Construction of methane collection systems
- Construction of infiltration and collection systems



Stranco has the capabilities to provide Clients a total turnkey landfill solution, from construction of a new landfill or additional cells to the final closure. Stranco is experienced

with the construction of subtitle C and D landfills.

Stranco also provides landfill closures. Such services include construction of RCRA landfill caps, synthetic liner systems, clay-liner systems, leachate collection systems, soil-layer covers, and other remediation and closure services.

2.5 Civil Construction

- Mass excavation
- Site development/utility installation
- Soil stabilization
- Structure and foundation demolition
- Road and highway construction
- Light to medium civil construction



Stranco is a General Contractor and a member of the Association of General Contractors. It is an experienced Municipal and Public Works Contractor with experience in the successful completion of many Heavy Construction projects.

2.6 Slurry and Reactive Wall Systems

- Biopolymer wall construction
- Slurry wall construction
- Groundwater collection systems

2.7 Volume Reduction

- Belt presses
- Centrifuges
- Recessed Chamber filter presses



Regulations regarding waste minimization and bans on land disposal of liquids and hazardous wastes have placed increased restrictions on sludge and semi-solid waste handling. In addition, disposal costs for incineration and other disposal alternatives have increased astronomically. Stranco provides its customers mobile dewatering and processing services as a solution to sludge and wastewater disposal problems. Stranco utilizes belt and filter (recessed chamber) presses and two- and three- stage centrifuges, that can be set up on site and produce up to a four to one reduction in sludge volume as well as a significant reduction in the weight of the waste material to be disposed.

3.0 Health & Safety Program

The goal of Stranco's health and safety program is to ensure safe project sites for our employees, subcontractors, clients, regulatory representatives, and the public. This goal is attained by maintaining a staff of well-trained personnel dedicated to achieving a culture centered on achieving a safe work environment.

3.1 Organization and Responsibilities

Stranco believes that health and safety is everyone's responsibility, from the equipment operators and technicians in the field to the General Manager.

Stranco's Project Managers and Supervisors are responsible for the health and safety of their personnel. This includes holding employees accountable for following safety plans or safety SOP's to ensure a proactive safety program and supervision in all facilities, locations, and operations. All managers receive special training in hazard recognition, safety regulations, company liabilities, accident trends, and resources for safety assistance to ensure they have the necessary management skills.

The manager's effectiveness is monitored through corporate site audits, review of daily toolbox safety minutes, and a medical surveillance program, which is administered by Corporate Health and Safety. The project incident record is reported through a system that tracks accidents and injuries, sorted by Project Manager and project. Monthly safety statistics are compiled by Corporate Health and Safety and distributed to all Managers.

All site employees are encouraged to assume responsibility for a safe work environment through a safety incentive program that rewards employees for safe work hours completed and for their safety suggestions.

3.2 Training

A major element of the corporate health and safety program is the initial on ongoing training provided to all field employees. A comprehensive 40-hour HAZWOPER training class is provided to all personnel prior to assignment. Advanced 8-hour manager's safety and health training is provided for all personnel whose duties involve supervision of work-site activities.

Additional and specialized training given to all newly hired personnel includes CPR, first aid, and specialized training in hazards unique to their projects. Refresher training is given annually throughout the employee's tenure with the company.

3.3 Work Site and Project Controls

Stranco requires a site-specific safety plan for each project to ensure the health and safety of our personnel, subcontractors, clients, regulatory representatives, and the public. We have also implemented a policy of zero-incident performance and conduct site inspections and daily safety meetings.

3.3.1 Site-Specific Health and Safety Plan

A site-specific health and safety plan (SHSP) is prepared and reviewed by Corporate Health and Safety for every Stranco project before on-site

work begins. The SHSP categorizes and lists all potential hazards, identifies required precautions and PPE, lists the required personnel and equipment decontamination capability that must be on site, and identifies project personnel assignments and responsibilities. All personnel must read, understand, and sign the plan before starting any work. The SHSP incorporates, as appropriate, Stranco's SOP's, including confined space entry, respiratory protection, fall protection, electric/mechanical lockout, and spills. The safety professional assigned to the project modifies the plan if the scope of work changes to ensure that the SHSP remains current.

3.3.2 Zero-Exposure Work Place

Stranco's policy and goal at each work place is zero exposure. We work toward this goal by selecting PPE based upon the worst-case scenario and adopting the policy that any downgrades to lower levels of protection must be based upon documented monitoring results. Exposure levels are monitored through personal air sampling and physical examinations. This monitoring is performed throughout the course of a project to provide safety professionals with the information necessary to evaluate the adequacy of protective work procedures and practices.

3.3.3 Inspections and Safety Meetings

The safety program is implemented at the field level through site technical assistance, audits, site-specific training, and daily safety meetings. Stranco's SHSO and supervisors are trained to perform daily work-site inspections

developed to ensure compliance with the established SHSP and applicable regulations. Daily safety meetings are conducted by the SHSO to review and address elements of the safety plan that contribute to preventing accidents during that day's scheduled activities.

3.4 Accident Prevention Program

Stranco's management believes that accidents create needless economic losses and are preventable. The long-term cost reduction goal is to eliminate all accidents or injuries through:

- **Training**
- **Site-specific project controls**
- **Immediate reporting and investigation of accidents and near misses**
- **An expedient return-to-work program**
- **Modification of unsafe site conditions**
- **Random drug and alcohol testing**

3.4.1 Reporting and Investigation

The immediate reporting of accidents to Corporate Health and Safety enables the prompt treatment of injured employees and initiation of the required investigation and reporting. The result of this timely investigation is the identification of possible unsafe conditions, retraining of personnel, and modification of the SSHP or SOP. Information from accident reports is relayed to the General Manager for review.

3.4.2 Expedient Return to Work Program

All accidents are reported to Corporate Health and Safety immediately after they occur, allowing Stranco to coordinate between the employee, job site, and clinic. This coordination allows Stranco to provide a liaison between the physician, injured worker, and the site supervisor. This program has had a significant impact in identifying accident causes, reducing the lost workday rate, and subsequently controlling Workers Compensation costs.

3.4.3 Drug and Alcohol Free Work Place

Stranco has a comprehensive drug and alcohol-screening program to ensure a drug-free work force. In addition to the standard pre-placement screening examination, Stranco retains the option to randomly conduct drug and alcohol exams. The combination of these programs identifies and proactively removes potentially unsafe workers from job sites.

4.0 Project Management Approach

The Stranco project management system has been developed to efficiently coordinate the total project effort using techniques that include:

- **Standard operating procedures**
- **Client/project team communication**
- **Administrative controls**
- **Careful management/monitoring of scope, schedule, and budget**
- **Standardized project accounting and cost tracking systems**

4.1 Project Team

Before a project begins, a project team is formed. Depending on the project scope and client requirements, the project team typically consists of:

- **Project Manager** - serves as the liaison between Stranco and the client, and oversees the day-to-day workings of the project and the project team
- **Site Health and Safety Officer** - defines, implements, and enforces the project-specific safety program and procedures
- **Project Administrator** - captures daily costs per each project task, representing the major input data to Stranco's project management system.
- **Quality Control Officer** - maintains compliance of the work performed with the contract requirements.
- **Sampling and Analysis Officer** - assures that analytical procedures, chain-of-custody, and laboratory QA/QC programs are followed.

4.2 Cost Control

Stranco is committed to delivering quality services on time and within budget. To determine costs, the individual elements of each project are measured as a function of time. Stranco uses the FACTS database program that tracks "real-time" project costs as a function of the percent complete of each task, as a measurement of determining cost controls. Stranco has extensive experience working under a variety of different contract terms and pricing structures including fixed price, time and materials, cost plus fee, and other more creative instruments.

Beginning with the first day of activity in the field, and each day of the project, the client is provided with a Daily Report of the Schedule of Values and the percent complete of each contractual value. This document provides Client review and participation in determining the pay measures earned for each day's activity, while the activities are still fresh in everyone's minds. This report keeps the Client apprised on a daily basis of the completion rates, unit quantities, and project schedule to allow detailed monitoring of the project progress on a daily basis. It serves to reduce conflicts and prevent confusion during project completion.

4.3 Quality Control

Stranco is committed to providing quality services and strives for continuous improvement. Stranco's executive management is actively involved in ensuring that services meet or exceed client requirements. Stranco's Quality Assurance Program (QAP) provides the methodology for assuring performance. The essential elements of the QAP are described here.

4.3.1 Quality Management System

The Quality Management system is organized to prevent confusion in the lines of authority and avoid assigning personnel conflicting responsibilities. The General Manager is responsible for implementing and overseeing the Quality Assurance (QA) program. The General Manager and the designated project QA representative are authorized to stop work if QA objectives are not being achieved.

4.3.2 Quality Improvement

The Stranco team consists of qualified experts driven to improve the quality of our services. Management encourages employees to continuously evaluate procedures, systems, and controls for improvement. Management continually reinforces communication with field personnel to ensure constant feedback and input for potential improvements.

4.3.3 Documents and Records

Stranco utilizes centralized corporate document controls to ensure that documents and records will be controlled, protected, maintained, and submitted according to contract specifications.

4.3.4 Design

The QAP establishes controls to ensure the design will be accurate and will convey specifications, drawings, procedures, and work instructions. All designs are subject to a rigorous process of review and approval prior to use.

4.3.5 Standard Operating Procedures

Written protocols, standard operating procedures (SOP's) and other control measures are used to ensure work is performed to established technical standards. Stranco implements a three-phase quality control system (preparatory, initial, and final control) during execution of our project work. Field instrumentation is maintained and calibrated in accordance with established Stranco protocols. All written protocols and SOP's are reviewed

periodically to ensure they are applicable in the current work environment.

4.3.6 Procurement

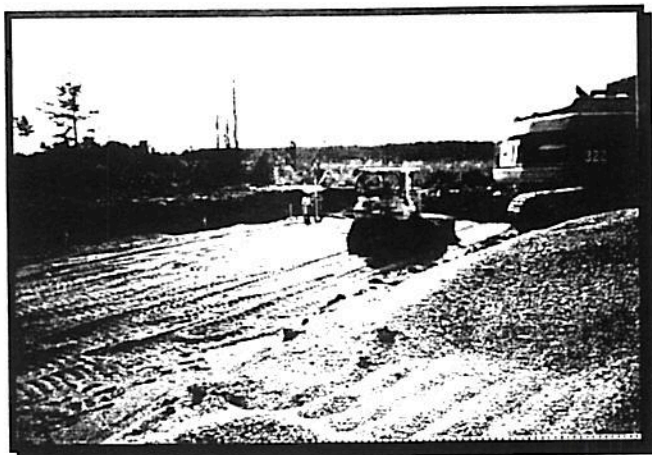
Stranco's procurement control system ensures materials and services meet the specification requirements, are suitable for their intended use, and are received and maintained in good condition prior to use.

4.3.7 Inspection, Tests, and Assessments

Acceptance inspections and tests of specified items, services, and processes are conducted using established acceptance and performance criteria. All routine inspections and acceptance inspections or tests are formally documented and submitted as required. Assessments are conducted to measure service quality, adequacy of work performed, and to identify areas for improvement.

5.0 Project Experience

Over the course of its 20/year history, Stranco has developed capability in a broad range of environmental and civil construction disciplines. Based on project execution that combines traditional construction methods, cost control, knowledge of environmental regulations, and common sense, Stranco has built an impressive resume in both the public and private sectors. The following project descriptions provide a representative cross section of Stranco's capabilities.



Major Railroad - Derailment, Louisiana

As the result of a major train derailment, where over a hundred cars were derailed and many were damaged, almost 90,000 cubic yards of soil was contaminated. Stranco excavated and transported the soils to an off-site Hazardous Waste facility for disposal. The wreck occurred in a small town, where the railroad paralleled the main street. There were also several areas of contamination. Some of the spilled contaminants were chlorinated hydrocarbons, which migrated at a rapid rate to contaminate the surface and sub-surface groundwater.



Stranco assisted in the installation of over 2,400 feet of bentonite slurry walls around six acres of contaminated areas. These walls were constructed of bentonite/soil and bentonite/clay under roadways. The slurry walls extended 15 - 20 feet vertically to tie into a thick, impermeable clay layer. Recovery wells were installed inside the protected area so that contaminated water could be recovered and treated. All water was treated and analyzed to meet discharge criteria prior to discharge.

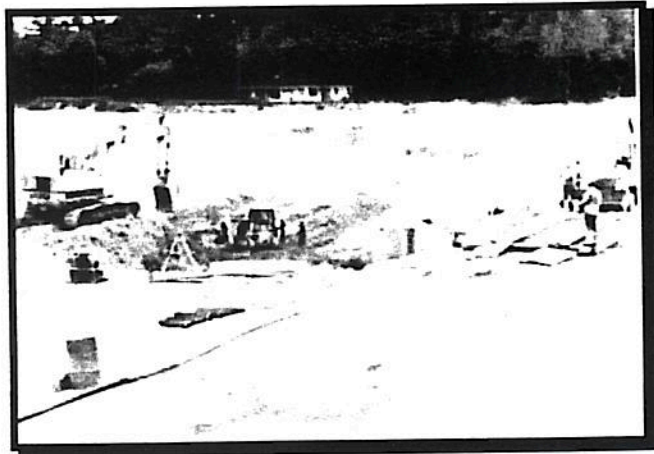
Stranco furnished and installed sand backfill for several areas. Clay backfill was provided, and in many situations, this clay was stabilized with lime, and compacted in place. Compacted clay caps were installed over several areas. Several hundred feet of rail bed were excavated and disposed due to contamination. Stranco reconstructed this rail bed, including replacement of concrete culverts. Many of the low-lying areas contained mud and it became contaminated. Stranco stabilized this sludge with cement kiln dust and routed the resultant material to proper disposal.

Contamination of surface water was a continuing problem, with the contaminated water spreading contamination to the soils on ditch banks. Stranco installed several hundred feet of reinforced concrete ditches to control the spread of contaminants. Stranco placed several thousand cubic yards of select topsoil, performed final grading, and provided re-vegetation of the affected areas.

This work activity was completed over an 18-month period. No injuries or worker exposure problems were experienced during operations. The work was performed under the daily

Statement of Qualifications

inspection of Environmental Consultants, Louisiana Department of Environmental Quality and EPA inspectors, railroad officials, Louisiana State Police Hazardous Materials Team, City officials, Parish Officials, and the Press.



Closure of Wood Products Facility, Alabama

This work involved the cleaning of over 23 tanks, vats, and vessels containing liquids and sludge. The contaminants were pumped, drained, vacuumed and shoveled to bulk liquid rail cars for transportation to incineration and disposal. The steel tanks and vessels were cleaned to the point that surface analysis showed them free of contamination. The steel was routed to scrap reclamation. Steel and concrete structures and foundations were sand blasted, tested as clean, and routed to scrap salvage or landfill disposal.

Contaminated soils and debris were excavated and transported to hazardous waste landfill disposal. Old buildings were demolished, with the contaminated sections routed to commercial hazardous waste landfill disposal, and non-contaminated materials were transported to industrial waste landfill disposal.



Several hundred feet of piping from pipe racks, both buried and from process areas, were removed and handled in a similar fashion. Process equipment such as boilers, heat exchangers, cooling towers, pumps, and tanks were removed and transported to proper disposal.

Various miscellaneous chemicals in small quantities were also encountered. These were identified for disposal, Lab-packed, and routed for proper disposal. Several underground tanks were cleaned, dug up and routed to disposal, along with their contents.

Several sludge and wastewater basins existed on site. Contaminated water was pumped to on-site treatment and discharged under and existing NPDES permit. Contaminated liquids and sludges were pumped into bulk liquid rail cars for transportation to incineration and disposal. Underlying contaminated soils were excavated and routed to commercial hazardous waste landfill disposal. One basin, after being cleaned of contamination was stabilized, backfilled and closed in place, and covered by a twelve-inch reinforced concrete cap.

Statement of Qualifications

The excavated areas were backfilled with compacted clay, capped with top soil and re-vegetated. A ground water recovery and treatment phase was then installed and operated to capture existed sub-surface contaminants.

This project was completed over a two-year period. Client consultants and the Alabama Department of Environmental Management inspectors provided routine inspections and guidance.

Major Chemicals Manufacturer, Mississippi

This project involved cleaning a resin pit. A tank had leaked 2,400 gallons of viscous resin contents into a concrete retaining basin. Stranco heated the resin with indirect heat, and vacuumed/pumped the resin into tankage for recovery and reuse by the client. The concrete surface was then steam-cleaned of all contamination, with the cleaning solution handled by the client's water treatment facilities.

Major Railroad, Emergency Response, Louisiana

Furnished personnel, equipment and transportation for a train derailment site clean up at Urania, Louisiana. A sulfuric acid car was derailed and ruptured. Stranco implemented barrier containment to prevent further spread of contamination, and re-routed drainage ditches. All contaminated surface water was then pumped to on site temporary storage tanks for treatment, testing and discharge.

Soils in the area were tested for contamination and treated by excavation to depths of two feet

with lime to neutralize the acid, then re-compacted in place. The area was completely backfilled, graded to match existing contours, and re-vegetated.

All work was performed under the inspection and approval of the Louisiana Department of Environmental Quality and railroad inspectors.

Major Railroad, Louisiana

Stranco removed equipment and stored materials from a site contaminated with pesticides. This was a materials storage yard for the railroad. All rails, ties, and maintenance parts were removed and transported to another yard. Work was performed utilizing Level C PPE. Approximately 600 cubic yards of material in a pit was stabilized and removed, then loaded into gondola cars for transportation to a Commercial Hazardous Waste Landfill for disposal. The pit was then backfilled with sand and capped with compacted clay and crushed stone.

The remaining contaminated soil was then excavated and transported to a Commercial Hazardous Waste Landfill. Over 2,000 cubic yards of contaminated soil were removed. The groundwater was also contaminated. Stranco designed and installed a French drain collection system, providing for the collection and pumping of the contaminated ground water to an on site treatment facility.

The are was backfilled with compacted clay, capped with top soil, and re-vegetated. Soil removal was performed under the inspection and approval of the Louisiana Department of Agriculture, the responsible agency for pesticides at the time.

Major Tire Manufacturer, Alabama

This project involved the in-place solidification of materials within an impoundment. The impoundment contained sludge ranging from two to four feet deep and covered over two acres. The sludge was stabilized using cement kiln dust and mixing with a track hoe. Stranco developed the mixture of sludge to dust ratio that was required to stabilize the sludge in order to pass the EP Toxic Leachate heavy metals specifications.

Equipment Manufacturer, Louisiana

Stranco sampled, analyzed, repackaged, and transported for disposal over 500 drums of hazardous waste. About 200 drums were leaking and required over-packing. The drums containing paint, solvent and thinner were routed to fuels blending operations for recycle use as blended fuel. This phase of the project was completed in 7 days.

A second phase of the project requirement involved site assessment utilizing soil borings to obtain samples of soil at various locations and depths, plus sampling of ground water. The results of this technical investigation were then furnished to the client.

Pesticide Remediation of a large Farm, Louisiana

This remediation project consisted of cleaning up pesticide containers, contaminated soil, and a building located on a large farm in Southern Louisiana. All materials were transported for proper disposal.

Major Railroad, Emergency Response, Mississippi

This train wreck involved the rupture of three liquid bulk cars of fatty alcohols, and several cars of PVC pellets and dust. Stranco responded immediately. The drainage ditches were blocked and rerouted. All surface water and liquids were collected and pumped to on site temporary tanks. All liquids were heated in the temporary tanks, and loaded into heated, insulated tankers for return to the customer. The fatty alcohols were recovered for reuse. The small amount of contaminants remaining were scraped from the surface and transported to a Commercial Hazardous Waste Landfill for disposal. The entire area was then re-vegetated.

The inert PVC pellets and dust was spread over a large area and intimately mixed into the top 18 inches of soil. Then the area was re-vegetated. This work was performed under the inspection and approval of railroad inspectors and the Mississippi Department of Environmental Quality.

Major Railroad, Emergency Response, Mississippi

This train wreck by a major railroad involved the rupture of three cars of chlorine gas. The resulting chlorine cloud spread over many acres. Rain during the release absorbed the chlorine gas and caused extensive ground surface contamination.

All trees within a 3-acre area were killed. Most pine trees and oak trees over a 10-acre area were also killed. Stranco removed the vegetation in the grossly contaminated area,

and the dead trees, as identified by the Mississippi Department of Forestry, from the expanded 10-acre area. This vegetation was then burned with a pit, on site. Removal of the dead vegetation was an attempt to control pine borers and webworms.

The three-acre site was tested for contamination, excavated to depths of two feet and neutralized using lime. The lime was tilled into the soil and the entire area was covered with topsoil, graded to match existing contours for drainage, and re-vegetated.

Some of the rail bed was also contaminated. This section was removed and spread over adjacent open areas, and treated as above. The roadbed was replaced utilizing compacted clay. Stranco had to then construct a dirt roadway of over ½ mile in length to gain access/egress to the site.

Battery Manufacturer, Texas

Stranco closed a sludge basin by stabilizing sludge and transporting the resultant material to a Commercial Hazardous Waste Landfill. The sludge was stabilized using Class C fly ash in a ratio developed by Stranco. Over 3,500 cubic yards of material was transported for disposal.

Major Refinery, Louisiana

This project involved the remediation of a 1.5-acre sludge pit. Stranco developed air sparging/mixing system to maintain solids in suspension. Sludge was removed through the use of vacuum trucks, and a vacuum system developed by connecting several air operated pumps in series. Sludge transferred to on site

tanks for temporary storage and analysis. Air mixing was utilized to maintain homogeneity in tanks.

The entire volume of sludge was removed, stored temporarily for analysis, and transported for disposal in just 20 days.

Major Railroad, Emergency Response, Arkansas

This train wreck involved the rupture of 12 cars containing organic material. The work was performed under the direction of the EPA Emergency Response Contractor.

The spilled material was collected and loaded onto other bulk liquid rail cars, where possible. The remaining sludge and contaminated soil was stabilized using Class C ash and the resultant mixture disposed at Commercial Hazardous Waste Landfill.

There was considerable low-level contamination remaining. A land treatment regimen was developed to biodegrade these low-level concentrations of organics. The contaminated soil was excavated and placed into the land treatment area. Discing and compacting surface soils in order to interrupt any silt lens or continuous drainage strata initiated by the Land treatment operations. A Geomembrane liner was placed over the re-compacted soil. This liner was then covered with a 6-8 inch layer of sand to provide water-drainage layer. The contaminated soil was then placed onto the sand at a depth of 2 feet. An Agigator® was then utilized to inject the nutrients and bacteria into the contaminated soil. Aeration was accomplished through utilization of highway construction discs and chisel plows to a depth

of 18 inches. The soil was aerated two times per week for a period of six months. The treated soil was then transported to an industrial landfill for disposal.

All excavated areas were backfilled with compacted clay, covered by topsoil, graded to existing contours for drainage and re-vegetated. During the spill, several hundred feet of the track bed was also contaminated. Stranco removed the contaminated areas and replaced the contaminated soil with compacted clay. The railroad then replaced the ties and tracks.

Monitor wells were installed around the land treatment area. No spread of contamination into ground water was detected.

Chemical Plant, Louisiana

After a fire, over 100 cubic yards of asbestos were removed and transported for disposal. Friable asbestos was immobilized by water spray prior to removal to insure against airborne contamination. Additionally, a special "wetting" agent was used. Large equipment required the installation of plastic screening devices and negative pressure to prevent asbestos emissions within the cabs of the equipment. Glove bags were utilized on the piping insulation. All surfaces were scraped, vacuumed, and wet wiped for final cleaning.

6.0 Additional Project Experience and Client Contacts

St. Tammany Parish Council
P.O. Box 628
Covington, LA 70434
Ph. 985.898.2360
Contact: Kevin Davis, Parish President
Project: Storm Debris Cleanup

Southern Recovery Management
3117 7th Street, Suite 100
Metairie, LA 70002
Contact: Joe Segretto
Project: Greater New Orleans landfill closure and cap
Contract Value: \$2.77M

Greenfield Industries
31479 SH 249
Pinehurst, TX 77362-3838
Ph. 281.259.6822
Contact: Tom Greenfield
Project: Hauling PCB contaminated soil from the Union Pacific train derailment site in Eunice, LA to various disposal facilities in Louisiana and Texas
Contract Value: \$50K

Waste Control Specialist, LLC
1710 W. Broadway
Andrews, TX 79714
Ph. 888.789.2783
Contact: Bill Boring
Project: Transporting hazardous waste from Texas City, TX to Andrews, TX
Contract Value: \$700K

St. Tammany Parish Council
P.O. Box 628
Covington, LA 70434
Ph. 985.898.2517
Contact: Kim Salter
Project: Transporting non-hazardous soil from Covington, LA to Sorrento, LA
Contract Value: \$50K

Vicksburg District
U.S. Army Corps of Engineers
2101 North Frontage Road
Vicksburg, MS 39180
Project: Levee repair and maintenance
Contract Value: \$1.5M

U.S. Army Corps of Engineers
Waterways Experiment Station
3909 Halls Ferry Road
Vicksburg, MS 39180
Project: Concrete Wave Flume
Contract Value: \$450K

USDA-SCS
EOC Office
202 Camp Knighton Road
New Iberia, LA 70560
Project: Levee repair and maintenance
Contract Value: \$85K

City of Baton Rouge
Parish of East Baton Rouge
P.O. Box 1471
Baton Rouge, LA 70821
Contact: Turhan A/C, P.E.
Project: Bayou Fountain Drainage Project
Contract Value: \$2.2M

Statement of Qualifications

U.S. Department of Health and Human Services
National Hansen's Disease Programs
1770 Physician's Park Drive
Baton Rouge, LA 70816
Contact: Suzanne Shumate
Project: 2.5-acre landfill cap in Carville, LA
Contract Value: \$192K

MI Drilling
Pogey Plant Road
Cameron, LA
Ph. 713.674.2406
Contact: Leonard Dupuis
Project: Demolition of abandoned pogey plant.
Soil, waste, debris, and concrete was loaded
and transported to various area landfills.
Contract Value: \$388K

World Environmental
3939 West McKinley Avenue
Milwaukee, WI 53208
Ph. 414.933.1700
Contact: Steve Stanek
Project: Transportation of 7,000 tons of
Hazardous and non-hazardous waste to various
area landfills
Contract Value: \$107K

Laidlaw Environmental, Inc.
P.O. Box 283
Crowley, LA
Contact: Charlie Benoit
Ph. 318.783.2624
Project: Removal of contaminated soil & install
ground water recovery system.
Contract Value: \$842K

Louisiana Department of Transportation
Bridge Department
P.O. Box 94245
Baton Rouge, LA 70804-9245
Contact: Dempsey White, Chief Engineer
Ph. 225.379.1409
Project: Bridge spans, approaches and
revetments over numerous parts of South &
Central Louisiana
Contract Value: \$2M

The Hardaway Company
P.O. Box 52-6603
Miami, FL 33152
Contact: Mike Newsom, Division Manager
Ph. 305.234.8856
Project: Hurricane Andrew Cleanup
Contract Value: \$1.5M

Union Pacific Railroad
24125 Aldine Westfield Road
Spring, TX 77383
Contact: Mark Ross, Environmental Manager
Ph. 713.350.7632
Project: Excavation, transportation and
disposal of approximately 50 underground
storage tanks throughout Southeast Texas and
Louisiana
Contract Value: \$1.1M

U.S. Navy
Building 157, Naval Support Activity
New Orleans, LA 70142-6000
Contact: Malcolm Coulom, Construction Mgr.
Ph. 504.361.2150
Project: N62467-90-C-7206
Contract Value: \$169K

Statement of Qualifications

Chemical Waste Management

P.O. Box 201916

Houston, TX 77216

Contact: Susie Cutaia

Ph. 713.875.1110

Project: V.A. Hospital contaminated soil removal and transportation, New Orleans, LA

Contract Value: \$860K

Landmark Land Company of Louisiana, Inc.

4600 Ponchatrain Drive

Slidell, LA 70458

Contact: Jack Raftery

Ph. 985.466.7469

Project: Eden Isles channel excavation; levee building excavation, load and transport fill material to various areas to build elevations on the property

Contract Value: \$1.875M

Ouachita Coca Cola Bottling

Monroe, LA

Contact: Sarah Moore, PAC

Ph. 318.343.7328

Project: Excavation and removal of contaminated soils

Contract Value: \$68K

Ware, Lind, Furlow and the Mississippi DEQ

Panhandler Truck Stop

Woodville, MS

Contact: John Malanchak

Ph. 601.956.4467

Project: Removal of UST's and remediation of the site

Contract Value: \$38K

New Orleans Levee Board

New Orleans, LA

Contact: Bryan Hava, Coastal Engineering

Ph. 504.347.2100

Project: Removal of UST's and remediation of the site

Contract Value: \$44K

Greater New Orleans Expressway

Metairie, LA

Contact: Gary Bourgeois, Gulf Engineering

Ph. 504.927.5588

Project: Removal of UST's and remediation of the site

Contract Value: \$25K

Affolter Contracting

Fort Polk, LA

Contact: Terry Affolter

Ph. 409.938.3837

Project: Transport non-hazardous contaminated soil

Contract Value: \$610K

IT-OHM Joint Venture

Slidell, LA

Contact: Jerry Reeder

Ph. 504.645.9330

Project: Bayou BonFouca Superfund site; concrete foundation removal

Contract Value: \$1.285M

St. Tammany Parish Hospital

Covington, LA

Contact: Jeff Cherry

Ph. 504.898.4589

Project: Parking Lot Repair

Contract Value: \$306K



Louisiana Public Service Commission

POST OFFICE BOX 91154
BATON ROUGE, LOUISIANA 70821-9154

Telephone: 225/342-4414

LAWRENCE C. ST. BLANC
Secretary

JOSEPH A. CHRISMAN
Director of Transportation

MARCH 5, 2003

INITIAL

REGISTRATION RECEIPT - FORM RS-3

LOUISIANA PUBLIC SERVICE COMMISSION
POST OFFICE BOX 91154
BATON ROUGE, LOUISIANA 70821-9154
TELEPHONE: 225/342-4414

In accordance with Public Law 102-240, this receipt, evidencing registration of ICC authority, must be carried in the cab of the vehicle and may not be altered. Alteration will result in confiscation and penalties.

ICC # 179415
Stranco, Inc.
70459 Hwy. 59
Abita Springs

LA 704200000

Effective: 01/01/2003 Expires: 12/31/2003

Serial No. 1156 3 0000249

This receipt authorizes this motor carrier to operate in the following states:

***AL(40), AR(40), CA(20), CO(20),
CT(20), GA(20), IA(20), ID(20), IL(20),
IN(20), KS(20), KY(20), LA(60), MA(20),
ME(20), MI(20), MN(20), MO(20), MS(40),
MT(20), NC(20), ND(20), NE(20), NH(20),
NM(20), NY(10), OH(20), OK(20), RI(10),
SC(20), SD(10), TN(20), TX(20), UT(20),
VA(20), WA(10), WI(10), WV(10)***

This is to acknowledge that you have filed a Notification of Regulated Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

LAD780776027

03/91

INSTALLATION ADDRESS

STRANCO INC
70459 HWY 57
ABITA SPRINGS, LA 70420
BILL BYRD VP

70459 HWY 57
ABITA SPRINGS, LA 70420

ACORD. CERTIFICATE OF LIABILITY INSURANCEOP ID BI
STRAN-6DATE (MM/DD/YY)
04/10/03

PRODUCER

ICT Insurance (Baton Rouge)
4621 Jamestown Ave
Baton Rouge LA 70808
Phone: 225-927-7575 Fax: 866-255-0200

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION
ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE
HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR
ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.

INSURERS AFFORDING COVERAGE

INSURED

Stranco, Inc., Stranco Solid
Waste Management Co. LLC,
Stranco Environmental
Resources Inc
70459 Highway 59
Abita Springs LA 70420

INSURER A Zurich American Ins Co
INSURER B La Commerce and Trade Associat
INSURER C Essex Ins Co
INSURER D
INSURER E

COVERAGES

THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. AGGREGATE LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	LIMITS
A	GENERAL LIABILITY	GL0540209300	04/07/03	04/07/04	EACH OCCURRENCE \$ 5,000,000
	<input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY				FIRE DAMAGE (Any one fire) \$ 100,000
	<input type="checkbox"/> CLAIMS MADE <input checked="" type="checkbox"/> TAIL				MED EXP (Any one person) \$ 5,000
					PERSONAL & ADV INJURY \$ 5,000,000
					GENERAL AGGREGATE \$ 5,000,000
	GEN'L AGGREGATE LIMIT APPLIES PER				PRODUCTS - COMP/PROP AGG \$ 5,000,000
	<input type="checkbox"/> POLICY <input type="checkbox"/> PROJECT <input type="checkbox"/> LOC				
A	AUTOMOBILE LIABILITY	TRK540209600	04/07/03	04/07/04	COMBINED SINGLE LIMIT (Ea accident) \$ 5,000,000
	<input type="checkbox"/> ANY AUTO				BODILY INJURY (Per person) \$
	<input type="checkbox"/> ALL OWNED AUTOS				BODILY INJURY (Per accident) \$
	<input checked="" type="checkbox"/> SCHEDULED AUTOS				PROPERTY DAMAGE (Per accident) \$
	<input checked="" type="checkbox"/> HIRED AUTOS				
	<input checked="" type="checkbox"/> NON-OWNED AUTOS				
	<input checked="" type="checkbox"/> MCS-90				
	GARAGE LIABILITY				AUTO ONLY - EA ACCIDENT \$
	<input type="checkbox"/> ANY AUTO				OTHER THAN EA ACC \$
					AUTO ONLY AGG \$
	EXCESS LIABILITY				EACH OCCURRENCE \$
	<input type="checkbox"/> OCCUP <input type="checkbox"/> CLAIMS MADE				AGGREGATE \$
					\$
	<input type="checkbox"/> DEDUCTIBLE				\$
	<input type="checkbox"/> RETENTION \$				\$
B	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY	14409103 INCLUDES OWNERS/OFFICERS	01/01/03	01/01/04	<input checked="" type="checkbox"/> WC STATUTORY LIMITS <input type="checkbox"/> OTHER \$
					E.L. EACH ACCIDENT \$ 1,000,000
					E.L. DISEASE - EA EMPLOYEE \$ 1,000,000
					E.L. DISEASE - POLICY LIMIT \$ 1,000,000
C	OTHER	PENDING	04/07/03	04/07/04	Cargo 40,000
	Cargo				Deductibl 40,000

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES EXCLUSIONS ADDED BY ENDORSEMENT SPECIAL PROVISIONS

Certificate holder is additional insured for Auto and General Liability as required by written contract. Waiver of subrogation for Auto and General Liability and Workers Compensation as required by written contract.

CERTIFICATE HOLDER

N ADDITIONAL INSURED: INSURER LETTER: _____

CANCELLATION

PS--LA1

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION

DATE THEREOF, THE ISSUING INSURER WILL ENDEAVOR TO MAIL

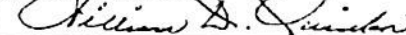
10 DAYS WRITTEN

NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO DO SO SHALL

IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE INSURER, ITS AGENTS OR

REPRESENTATIVES.

AUTHORIZED REPRESENTATIVE



PSC
543 Renaud
Lafayette LA 70507

REPA WORK ASSIGNMENT FORM

WAM

1. Funding: RCRA
Buy-In: NO
6. Account #: 7. DCN:
10. Site/Facility Name: SBA SHIPYARDS
11. Location: JENNINGS,
14. EPA Site/Facility ID #:

2. REPA Number: 17
3. Contract No.: 68-W-99-017
8. Prime Contractor: TECH LAW IN
12. State: LA
16. Purpose:

4. Work Assignment #: R06708
5. Amendment Number: 00000
9. Priority: Normal
13. Region/HQ: 06

Initiate New Work Assignment

17. Task Type: Technical Review of Documents (A17)
Field Oversight (A9)
18. Task Number: 37
14

19. Comment: THE PURPOSE OF THIS ACTION IS TO INITIATE A NEW WORK ASSIGNMENT. THE CONTRACTOR IS AUTHORIZED 250 LOE HOURS AND \$15,000 FOR WORK PLAN DEVELOPMENT AND TASK INITIATION. CONTRACT SOW REFERENCE: PAGE 1-12 OF 23, FIELD OVERSIGHT; PAGE 1-20 OF 23, TECHNICAL REVIEW OF DOCUMENTS.

20. Action	Base		Option 1		Option 2	
	LOE	Cost/Fee	LOE	Cost/Fee	LOE	Cost/Fee
Previously Approved:	0	0	0	0	0	0
This Action:	250	15,000	0	0	0	0
Total:	250	15,000	0	0	0	0

22. POP End Date: 09/30/00

23. Number of Pages to Follow: 25

24. Reference Information: Attached Transmitted Separately Pick Up From

25. Initiator: Work Assignment Manager (WAM)

(SIGN) *Gene Keepper*

Name: GENE KEEPPER

25. Address: 1445 ROSS, 6EN-HX, DALLAS, TX 75202

27. Phone No.: 214-665-2280

28. Date: 7/9/99

29. Approval: Regional Project Officer or HQ Project Officer (RPO/PO)

(SIGN) *Rena McClurg*

Name: RENA MCCLURG

30. Address: 1445 ROSS, 6EN-HX, DALLAS, TX 75202

31. Phone No.: 214-665-8314

32. Date: 7/9/99

33. Contracting Officer (CO)

(SIGN) _____

Name: JOAN C. THURMAN

35. Date: / /

(Effective Date)

36. Contractor Acknowledgement Of Receipt (Signature and Title)

(TITLE) _____

37. Date: / /

(SIGN) _____

ATTACHMENT V
ESTIMATED COST
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ATTACHMENT III
ANTICIPATED LEVEL OF EFFORT

Staffing	Name	Firm	Labor Category	01	02	03	04	05	06	07	08	09	10	TOTAL
Regional Manager	D. Pandak	TL	P-4	10	16	10	10	0	0	4	4	4	24	82
Work Assignment Manager	P. Davol	TL	P-4	10	38	10	10	0	0	10	10	10	10	108
Staffing	P. Davol	TL	P-4	10	0	65	30	0	0	5	50	0	80	240
	W. O'Rear	TL	P-3	6	0	0	0	0	0	20	0	40	10	76
	M. Nur	TL	P-4	0	0	160	60	0	0	0	0	0	160	380
	G. Starkebaum	TL	P-4	0	0	120	40	0	0	0	0	0	120	280
	D. Walker	TL	P-3	0	0	32	24	0	0	0	0	0	40	96
	T. Baugher	TL	P-1	0	0	0	0	0	0	40	0	80	0	120
	J. Housley	TL	P-1	0	0	0	0	0	0	0	0	80	0	80
	W. Buckaloo	TL	P-2	0	0	0	0	0	0	0	7	0	0	7
	P. Gray	TL	P-2	0	0	0	0	0	0	0	25	0	0	25
	A. Duckett	TL	P-2	0	0	0	0	0	0	0	25	0	0	25
	C. Lozano	TL	P-2	0	0	0	0	0	0	0	10	0	0	10
	T. Kuhn	TL	P-3	0	0	0	0	0	0	0	2	0	0	2
	J. Smiles	TL	P-2	0	0	0	0	0	0	0	24	0	0	24
	S. Cowan	TL	P-3	0	0	0	0	0	0	0	60	0	0	60
	A. Todd	TL	T-2	18	38	8	8	0	0	4	8	4	8	96
	S. Irving	M&E	P-3	0	10	0	0	0	0	0	0	0	0	10
	M. Raimonde	M&E	P-3	0	0	0	2	0	0	0	0	0	4	6
	J. Peoples	M&E	P-3	0	0	0	12	0	0	0	0	0	24	36
	G. Neck	M&E	P-3	0	4	0	0	0	0	0	0	0	0	4
	S. Blanchard	M&E	P-2	0	0	0	24	0	0	0	0	0	48	72
	J. Warburton	M&E	P-2	0	0	0	24	0	0	0	0	0	48	72
	TOTALS			54	106	405	244	0	0	83	225	218	576	1911

Handwritten notes:
 01 WP-DRAP
 02 PM
 03 Int. Doc. file Rev.
 04 Tech. Rev.
 05 Sampling Tasking
 06 Pub. Inv. Notest.
 07 Admin. Rec.
 08 PC Imaging
 09 Text Retrieval
 10 Sample Analytical Results Database
 Indep. Geo. Hydrogeo. Assess. ment

ATTACHMENT VI

ATYPICAL ODC COST ESTIMATES

TASK 07	
\$300	Bate Stamp 6000 pages @ \$0.05 per page
\$210	10 Binders @ \$21.00 each
\$360	Copy Administrative Record - 6000 pages @ \$0.06 per page
TASK 08	
\$1,500	Copy Louisiana Files - 6,000 pages @ \$0.25 per page
\$2,370	Total

Attachment IV - a
 ESTIMATED TRAVEL COSTS

Staff	Total	Days	From/To	Train/Air	Hotel \$	Meals \$	Rental Car \$	Local	Cost \$
P. Davol/ Review State Material	5		Austin, TX/ Baton Rouge, LA	\$250	\$236	\$190	\$300	\$60	\$1,036
S. Cowan/ Review State Material	5		Dallas, TX/ Baton Rouge, LA	\$250	\$236	\$190	\$0	\$60	\$736
Total				\$500	\$472	\$380	\$300	\$120	\$1,772

Notes:

Estimates for hotel and meals are based on allowable per diem rates for the destination city. The calculations for these costs are shown in Attachment IV-b below.

Local travel includes cab fare, public transportation, mileage, parking and tolls.

The TechLaw team follows the requirements of subpart 31.2 of the FAR and the Federal regulations in incurring allowable travel costs under this work assignment.

The team will at all times seek and obtain government rates whenever available and observe current subsistence ceiling.

ATTACHMENT IV-B
 WORK SHEET FOR TRAVEL CALCULATIONS

Staff/Purpose of Trip		Total Hotel and Total Meals Calculations	
P. Davol/ Review State Material	Total Hotel:	4 days x 59	(per diem) = \$236
	Total Meals:	5 days x 38	(per diem) = \$190
S. Cowan/ Review State Material	Total Hotel:	4 days x 59	(per diem) = \$236
	Total Meals:	5 days x 38	(per diem) = \$190
TOTAL		Hotel:	\$472
		Meals:	\$380

R06708-
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STATEMENT OF WORK

for

SBA Shipyards
Jennings, LA
EPA ID # LAD008434185
Corrective Action Order Development and Oversight Assistance

Contract No.: 68-W-99-017
Work Assignment: R06708
Work Assignment Manager: Gene Keepper

April 7, 1999

STATEMENT OF WORK (SOW)

SBA Shipyards
Jennings, LA
EPA ID # LAD008434185

Contract No.: 68-W-99-017

Work Assignment: R06708

Work Assignment Manager: Gene Keepper

Corrective Action Order Development and Oversight Assistance

1.0 BACKGROUND

SBA Shipyards, Inc. (SBA) consists of approximately 97 acres located on the Mermentau River, 9040 Castex Landing, at the end of LA Hwy. 3166, Jefferson Davis Parish, Jennings, LA. During 23-25 August 1994 the RCRA Enforcement Branch inspected SBA. PRC Environmental Management Inc., (PRC), now Tetra Tech Environmental Management, Inc. (TTEM) provided sampling support. On 22 March 1995 EPA and TTEM returned to SBA to sample the site. Prior to EPA involvement at SBA, the Solid Waste, Ground Water Protection, and Hazardous Waste Divisions of the Louisiana Department of Environmental Quality (LDEQ) had dealt with SBA since February 1990. Three (3) sampling events, one in 1989, another in 1993, & the third in 1996, have been conducted at SBA by consultants to SBA, their counsel, or lessee. Detected constituents and concentrations are summarized in Attachment A. EPA is drafting a RCRA §3008(h) Final Consent Order (FCO) to address the complete investigation and remediation of this site.

The Final Consent Order (FCO) will require SBA to undertake and complete corrective action activities to the satisfaction of EPA. SBA shall implement and complete the Interim Measures (IM), RCRA Facility Investigation (RFI), and Corrective Measures Study (CMS) programs in accordance with the FCO and applicable EPA approved work plans. SBA shall conduct any additional work EPA requires in accordance with the FCO. All tasks listed in Section 3.1 of this SOW should be completed by September 1999 if fully funded per the attached independent government cost estimate.

2.0 PURPOSE

The contractor oversight of corrective actions will be divided into a two (2) phase Work Assignment (WA). The following tasks will be included in Phase I. The contractor shall:

- A) develop a Work Plan which will encompass all the tasks in the Statement of Work,
- B) develop a generic Quality Assurance Project Plan (QAPP) to be submitted as part of the Work Plan;
- C) meet with EPA's Work Assignment Manager (WAM) as needed for project development;
- D) conduct a facility file review and background information review;
- E) review and comment on submittals provided by SBA currently in the possession of EPA (i.e.: IM, RFI, Ground Water Remediation and Monitoring, CMS, and CMI Work Plans/Reports) for technical accuracy, completeness, adequate quality assurance and quality control (QA/QC) procedures and sufficiency, and,
- F) provide monthly progress reports to EPA

The following tasks shall be included in Phase II. The Contractor shall:

- A) review and comment on submittals required by the FCO, or otherwise provided by SBA (i.e.: IM, RFI, CMS Work Plans/Reports) for technical accuracy, completeness, adequate quality assurance and quality control (QA/QC) procedures and sufficiency;
- B) observe Facility ground water monitoring well installations, observe Facility ground water sampling events, conduct ground water monitoring well split sampling events, observe Facility soil sampling events,

conduct soil sampling spilt sample events, and develop and transmit reports to EPA documenting all of the above activities;

- C) assist with public involvement activities;
- D) maintain an administrative record of corrective action activity documents associated with the site; and
- E) upon written technical direction by EPA, conduct an independent geological/hydrogeological assessment of the Facility utilizing available information.

3.0 STATEMENT OF SERVICES

Contract resources are requested to assist the RCRA Work Assignment Manager (WAM) for the following tasks:

3.1 Phase I Tasks

3.1.1 Work Plan and Generic QAPP

A Work Plan and associated QAPP encompassing the entire project shall be developed by the contractor and submitted to EPA for approval. The work plan shall provide separate Level Of Effort (LOE) and cost estimates for each individual task included in this SOW. The QAPP shall address all elements of project QA and QC and generically address QA/QC related to sampling and laboratory analyses. When sampling and analysis is necessary, an event specific QAPP will be prepared as described in 3.2.2. The Work Plan submitted by the Contractor shall be amended as necessary to meet the needs of the project.

3.1.2 EPA/Contractor Coordination Meeting, Progress Reports

The contractor shall meet, in person or telephonically, with EPA technical staff as necessary to discuss current and future issues related to this case and the SOW.

The contractor shall provide EPA monthly progress reports. Monthly progress reports shall provide:

- A) details regarding activities conducted pursuant to the SOW during the previous month;
- B) actual current monthly project budget expenditures;
- C) actual project to date budget expenditures; and
- D) estimated project completion costs. The report of costs will be task specific and specify LOE's, level of personnel working on the project, and document all expenses associated with completing the task (e.g., computer time, reproduction costs, per diem, etc.). The information shall be provided in form that EPA can use as an invoice to recover costs from SBA.

3.1.3 Initial Document and File Review

The contractor shall:

- A) conduct a detailed review of background information and facility files in EPA's possession;
- B) review and comment on submittals provided by SBA currently in EPA's possession (i.e.: IM, RFI, Ground Water Remediation and Monitoring, CMS, and CMI Work Plans/Reports) for technical accuracy, completeness, adequate quality assurance and quality control (QA/QC) procedures and sufficiency; and,
- C) also be familiar with the Draft Consent Order.

3.2 Phase II Tasks

3.2.1 Technical Review of Workplans and Reports

The contractor will review and provide comments on all RFI, CMS, and IM submittals (e.g., draft workplans, reports, and data) from the facility for technical accuracy, completeness, adequate QA/QC procedures, and sufficiency. The contractor will provide as required by EPA, independent technical evaluations (e.g., geologic interpretations, engineering evaluations, modeling, etc.) of data provided by SBA.

3.2.2 Sampling Events

Upon written technical direction from EPA, the contractor will conduct split or lead sampling events for all media. The contractor shall:

- A) provide oversight (e.g., adherence to the facility QAPP, specific sampling methodologies, etc.) and split samples, with adequate QC sample collection, during Facility lead sampling events;
- B) review and comment on the adequacy of sample locations and sample depths;
- C) conduct lead sampling event(s) to obtain waste or media specific samples including adequate QC sample collection (e.g. collection of correct number of duplicate, trip blank, and equipment blank samples and extra volumes required for laboratory quality control analyses).
- D) arrange for a suitable laboratory to provide analytical services (e.g., soil sample analyses for 40 CFR Part 261 Appendix VIII constituents, ground water samples for analyses for 40 CFR Part 264 Appendix IX constituents, etc.) in accordance with EPA methods specified in SW-846, 3rd Edition, as amended by Updates I, II, IIA, IIB, and III as appropriate. This shall include, but not be limited to:
 - a) providing QA/QC documentation for analytical data in accordance with the EPA Contract Laboratory Program (CLP) requirements for enforceable data in accordance with Exhibits E and F of both Statements of Work for Organic Analysis (EPA-540/R-94/073, OLM03.1) and Inorganics Analysis, Multi-media Multi-concentration (EPA/540/R95/121, ILMO 4.0). The data must be of a quality to support adversarial litigation in a court of law;
 - b) arranging to ship samples in a manner adhering to Department of Transportation (DOT) requirements to the laboratory for sample analysis after each sampling event, and;
 - c) arranging for disposal of sampling derived waste on site or through a commercial Treatment Storage and Disposal (TSD) facility.
- E) finalize the generic QAPP described in Phase I of this SOW for each specific sampling event. Analytical test methods utilized for organic and inorganic chemicals are to be as prescribed in, Test Methods for Evaluating Solid Waste, Third Edition, SW-846.

3.2.3 Public Involvement Activities

Upon written technical direction from EPA, the contractor will provide assistance for public involvement activities associated with the corrective action process as directed by EPA. The assistance will include development of community mailing lists, coordinating logistics for public meetings, preparation of documents and visual aids, and conducting community interviews/surveys.

3.2.4 Administrative Records

The contractor shall maintain and update an administrative record for all existing documents related to the corrective action activities for the site. The file shall contain original or copied existing documents arranged in chronological order. The administrative record will include an index of the documents with the document title, document type, author, and author organization, and other fields

as specified by EPA. The index will be provided in both a paper format and as a computer file compatible with existing EPA databases. The EPA WAM shall notify the contractor through written technical direction to deliver copies as required by the government or to amend the administrative record, if necessary.

3.2.5 PC-Based Imaging/Full Text Retrieval System

Upon receipt of written technical direction from EPA, the contractor shall retrieve documents from EPA, the State of Louisiana, the Parish of Jefferson Davis, the City of Jennings, and other entities, and incorporate them into an PC-based imaging/full text retrieval system. This system shall provide a computer based index to the documents that are imaged as well as a notation within the index which indicates where the imaged documents exist in hard copy format. Upon written technical direction by EPA, the contractor shall produce and transmit to EPA copies of the documents contained in the PC-based imaging/full text retrieval system and/or any computer/optical disks. It is estimated that there approximately 5,000 pages of documents from the above files that will need to be incorporated into the system.

3.2.6 Environmental Sample Analytical Results Database

Upon receipt of written technical direction from EPA, the contractor shall obtain environmental sample analytical results from EPA and develop and maintain a computerized analytical results database. This database shall include fields for the sample number, case number, date sampled, media sampled, sample location, analytical lab, constituents, and concentrations. Upon receipt of written technical direction from EPA, the contractor shall add new sample results to the database, modify the database to include additional fields, analyze the database information or produce and analyze custom reports in specified formats.

Upon written technical direction from EPA, the contractor shall prepare and submit any of the following deliverables: one paper copy of summary reports which contain all or part of the sample results contained in the database; and a PC-based menu-driven analytical summary database on computer disks with accompanying support manual.

3.2.7 Independent Geological/Hydrogeological Assessment

Upon written technical direction from EPA, the contractor shall conduct an independent geological and hydrogeological assessment of the Facility utilizing available information consisting of soil boring logs, ground water pump tests, ground water monitoring well logs, geophysical logs, analytical results, and historical workplans/reports and any other available data. The contractor shall meet with EPA to discuss the specific requirements of this task.

4.0 SCHEDULE OF DELIVERABLES

The workplan developed by the contractor shall incorporate the following schedule of deliverables:

- 4.1 The contractor shall submit a work plan encompassing all the items in this work assignment within twenty (20) days of receipt of WA approval by EPA. (Task 3.1.1)
- 4.2 The contractor shall meet with EPA to discuss the WA within ten (10) days after receipt of WA approval by EPA. (Task 3.1.2)
- 4.3 Monthly progress reports shall be due on the twentieth (20) day of the month following the subject report month. (Task 3.1.2)

- 45
- 4.4 Comments, recommendations, and reports are to be submitted to EPA within twenty (20) days of the contractors receipt of the review documents, unless otherwise specified by EPA. (Task 3.2.1)
 - 4.5 Specific sampling event QAPP's shall be delivered to EPA within ten (10) days of notification by EPA of the specific sampling event. (Task 3.2.2, Task 3.2.3)
 - 4.6 All analytical results and accompanying comments shall be submitted to EPA within seven (7) days of the contractors receipt of the data, unless otherwise specified by EPA. (Task 3.2.2)
 - 4.7 All sample reports shall be submitted to EPA within twenty (20) days of completion of the sampling event by the contractor. (Task 3.2.2)
 - 4.8 Contractor shall be prepared to conduct sampling events, oversight trips, or site visits within fifteen (15) of notification by EPA of the specific event. (Task 3.2.2, Task 3.2.3)
 - 4.9 Contractor shall be prepared to conduct public involvement activities within fifteen (15) days of notification by EPA of the specific event. (Task 3.2.4)
 - 4.10 The administrative record and accompanying index shall be delivered to EPA within thirty (30) days of notification by EPA. (Task 3.2.5)
 - 4.11 The assessment report will be due sixty (60) days after receipt of request for this task, unless otherwise specified by EPA. (Task 3.2.7)

5.0 GOVERNMENT FURNISHED DATA

The following information will be supplied by the government during the implementation of this WA:

1. Existing information related to the Facility.
2. Draft or final work plans & reports, Draft Consent Order for reference and data related to the Facility.
3. Media to be sampled, sample locations, constituents for laboratory analysis, desired sampling dates, and other logistical information related to either the initial site visit, soil or ground water sampling events, or field trips.

Travel Cost Estimates

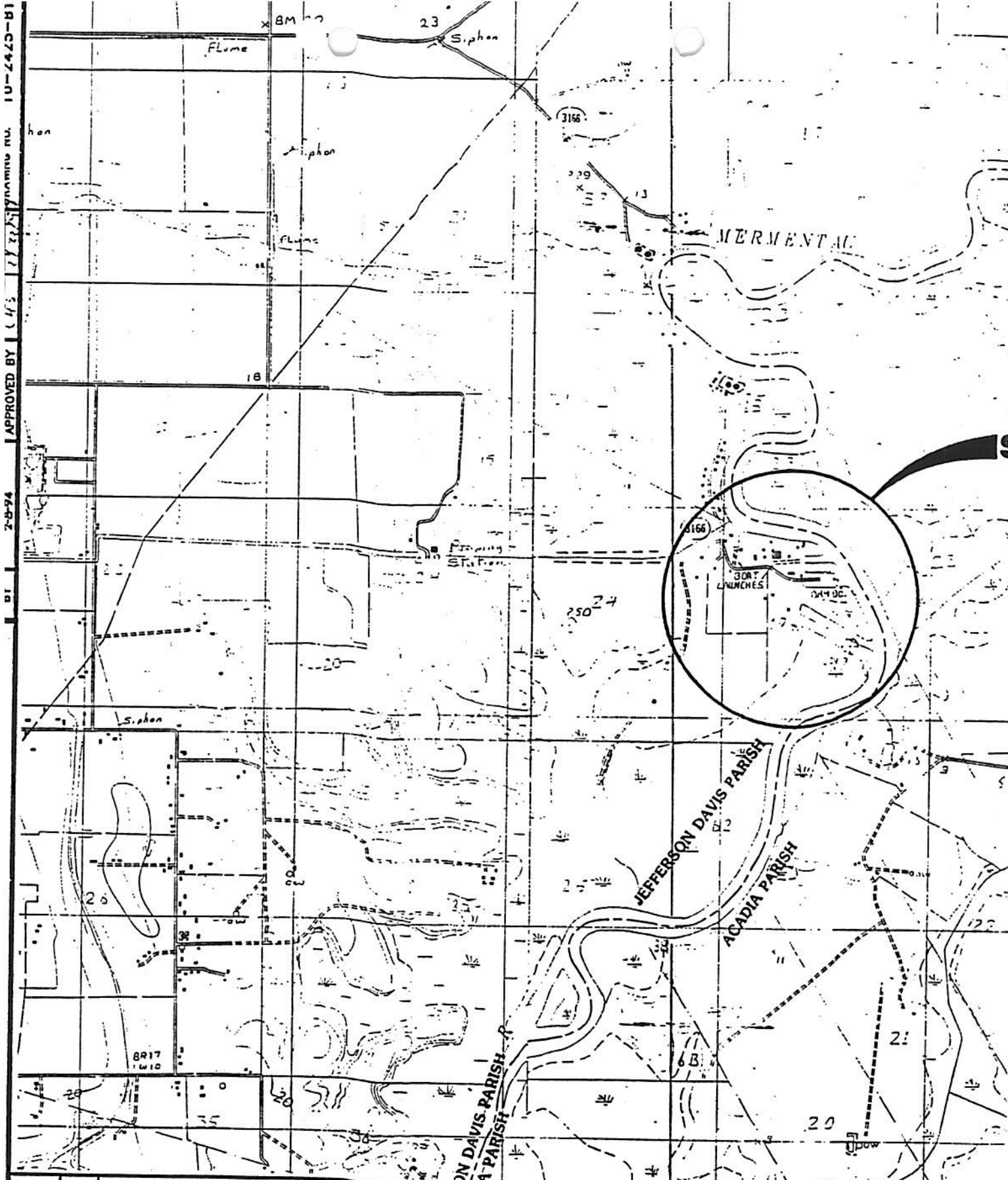
Tasks 3.2.2 to 3.2.4

2 Trips - 3 People

Item	Unit Cost	People	Days	Total Cost/2 Trips
Airfare - Roundtrip DFW/Lake Charles	250/Roundtrip	3	2 Trips	\$1,500
Per Diem	90/Day	3	10 (5 per trip)	\$2,700
Rent Car	60/Day	N/A	10 (5 per trip)	\$600
TOTAL for 2 Trips:				\$4,800

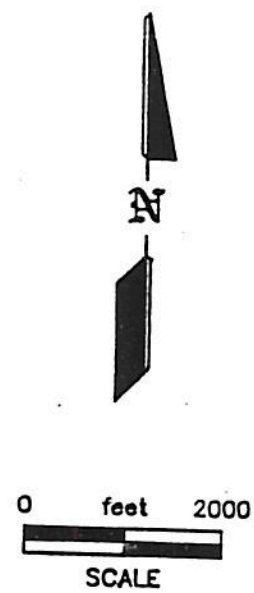
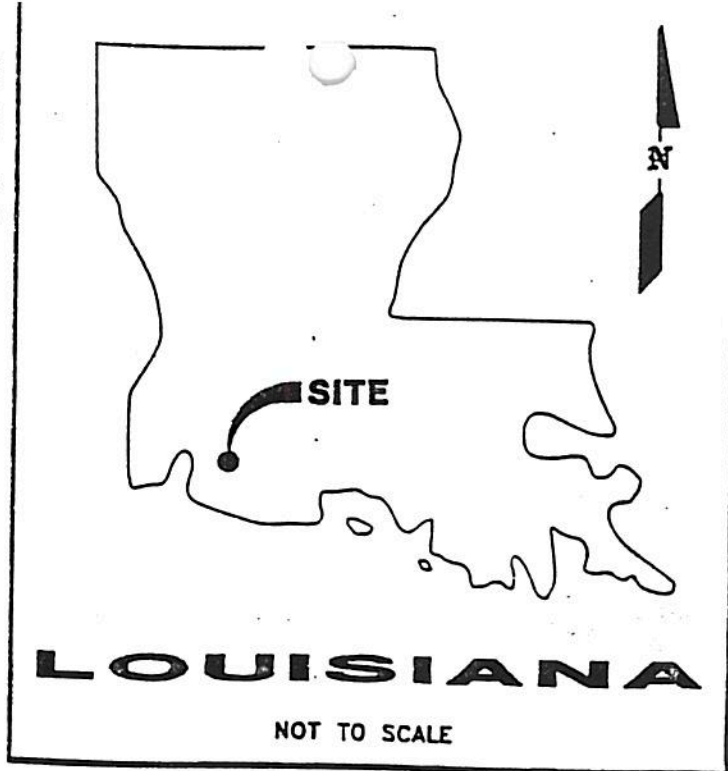
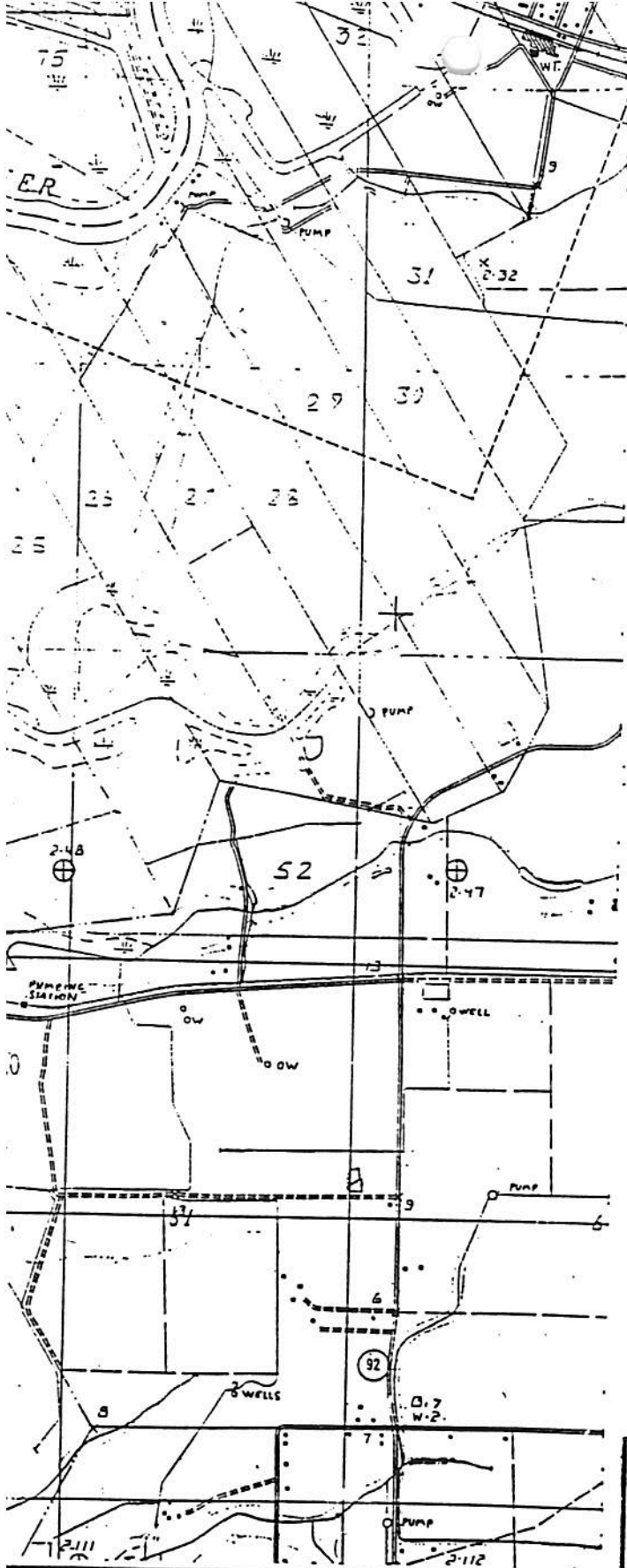
ATTACHMENT “A”

APPROVED BY [Signature] 2-8-94 DT 10-2423-B1



DATE	NO.	REVISION	BY

LEE VAC SHIPYARDS, INC
JENNINGS, LOUISIANA
Client



RE: U.S.G.S. 7.5 MINUTE SERIES QUADRANGLE MAP,
MERMENTAU, LA 1984 & JENNINGS, LA 1985

**MODIFIED PHASE I ENVIRONMENTAL
ASSESSMENT AND LIMITED SITE INVESTIGATION**
SBA SHIPYARDS, INC
JENNINGS, LOUISIANA
Project Location

G&E ENGINEERING, INC. ENVIRONMENTAL CONSULTANTS	
VICINITY MAP	
1 Fig. No.	



Client

SHOWING PROPERTY

OF

SBA SHIPYARD, INC.

TO BE LEASED

TO

LEEVAAC SHIPYARDS

LOCATED IN

SECTION 19 T-10-S, R-2-W

JEFFERSON DAVIS PARISH

LOUISIANA

DATE: 12/7/93

500

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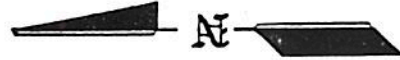
500

SCALE IN FEET

SCALE 1" = 500'

Michael P. Guidry
MICHAEL P. GUIDRY

HUTCHINGS & GUIDRY
CIVIL ENGINEERS & LAND SURVEYORS
LAFAYETTE & JENNINGS, LA.



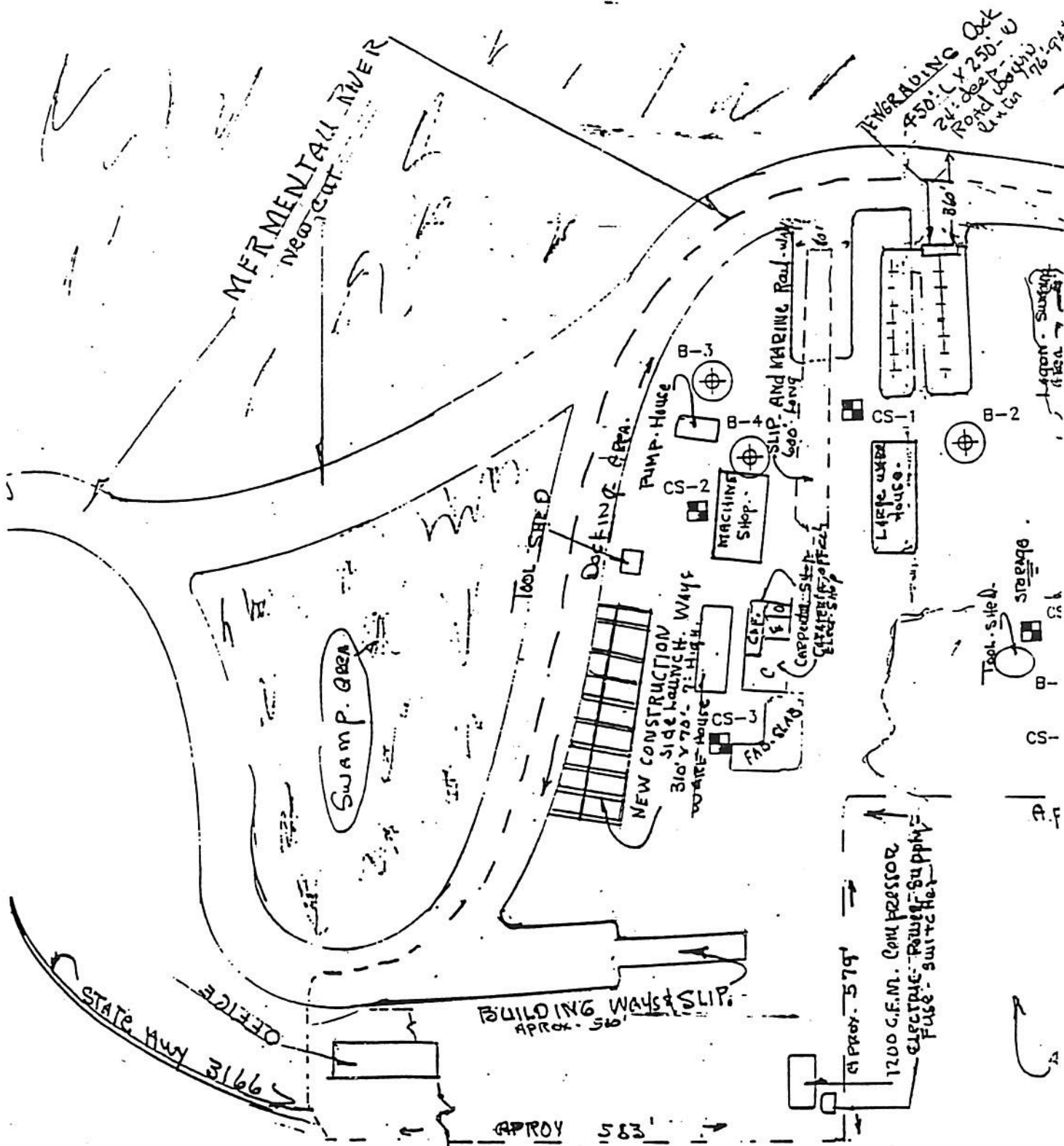
G&E
ENGINEERING, INC.
ENVIRONMENTAL CONSULTANTS

SURVEYORS PLAT

2

Fig. No.

MODIFIED PHASE I ENVIRONMENTAL
ASSESSMENT AND LIMITED SITE DEVELOPMENT
SBA SHIPYARDS, INC.
JENNINGS, LOUISIANA
Project Location

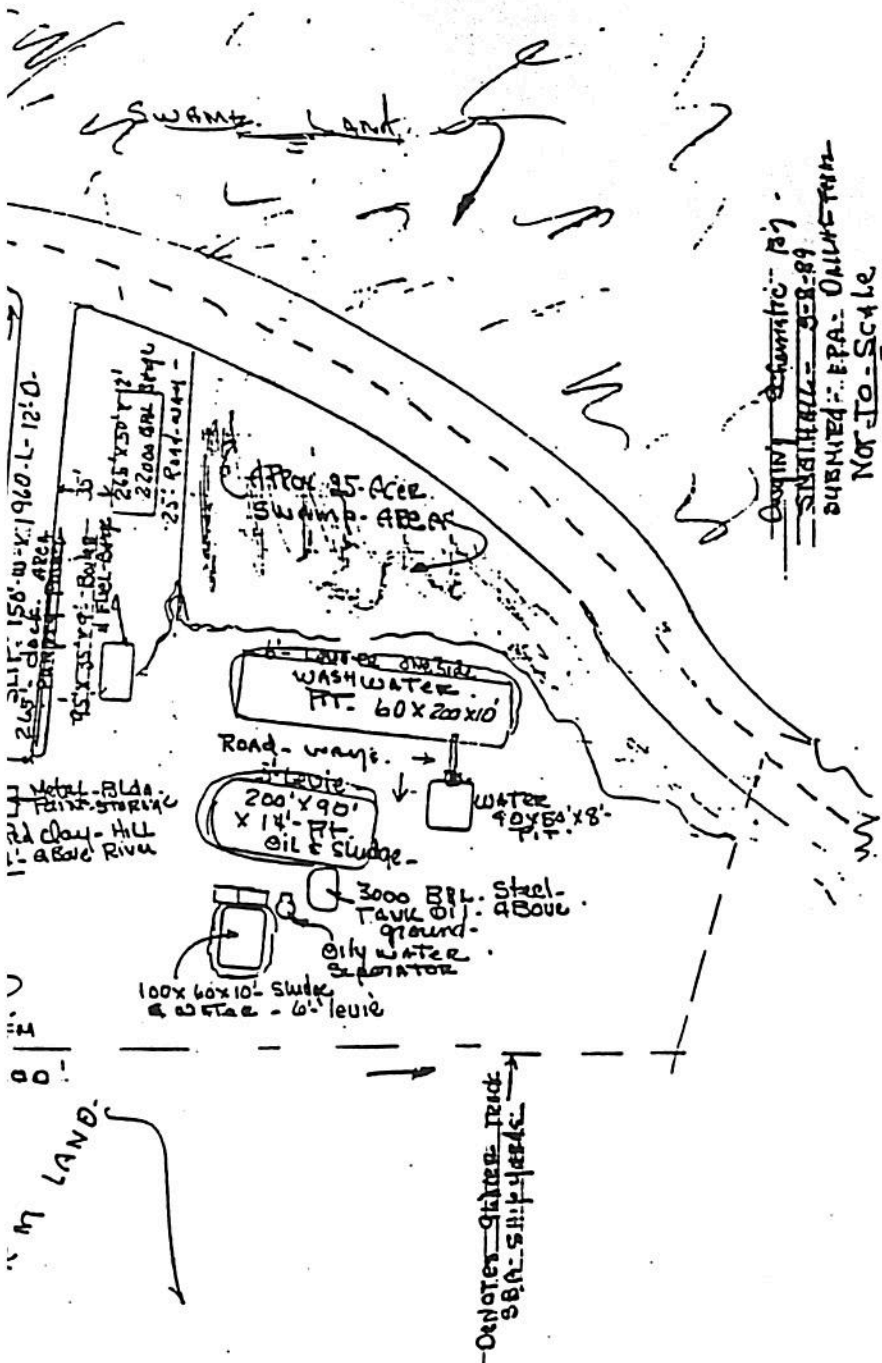


Re: Drawing obtained from LADEQ.
Files reviewed by G&E Engineering.



LEEYAC SHIPYARDS, INC.
JENNINGS, LOUISIANA

Client

DATE	NO.	REVISION	BY



LEGEND

- B-1  SOIL BORING
- CS-1  COMPOSITE SURFACE MATERIALS SAMPLE LOCATION

NOT TO SCALE

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ENVIRONMENTAL CONSULTANTS

MODIFIED PHASE I ENVIRONMENTAL ASSESSMENT AND LIMITED SITE INVESTIGATION
SBA SHIPYARDS, INC.
JENNINGS, LOUISIANA
Project Location

SITE PLAN WITH BORINGS AND SAMPLING LOCATIONS

3
Fig. No.

22. SBA sampled the sludge in Water Pits #1 - 3 and the Oil Pit in November 1989. The data reported in Appendix B of the ERI WGCAP revealed the hazardous constituents noted in Table 1:

Table 1

Constituents ¹	Concentration (mg/kg)		
	0444 OPI (Lab No. 891114-0131)	0445 OPI (Lab No. 891114-0132)	0446 OPI (Lab No. 891114-0132)
Benzene	266	313	NA
Chloroform	20.9	24.8	NA
1,2 Dichloroethane	144	165	NA
Ethyl benzene	93.8	66.2	NA
Tetrachloroethene	1,740	1,930	NA
Toluene	503	593	NA
1,1,1-Trichloroethene	73.2	87.7	NA
Trichloroethane	117	140	NA
Total xylenes	1,010	1,100	NA
Acenaphthene	NA	NA	3,050
Acenaphthylene	NA	NA	762
Anthracene	NA	NA	27,100
Benzo (a) anthracene	NA	NA	1,190
Benzo (a) pyrene	NA	NA	867
Benzo (ghi) perylene	NA	NA	536
Benzo (k) fluoranthene	NA	NA	1,140
Chrysene	NA	NA	2,640
Fluoranthene	NA	NA	5,220
Fluorene	NA	NA	5,810
Indeo (1,2,3-c,d) pyrene	NA	NA	454
Naphthalene	NA	NA	17,500
Phenanthrene	NA	NA	16,100
Pyrene	NA	NA	3,690

¹NA indicates a constituent not analyzed for in this sample.

23. During the August 24, 1994, CDI, Water Pits #1-#3 and the Oil Pit were sampled. The samples collected from Water Pit #2 exhibited the toxicity characteristic as shown in Table 2:

Table 2

CONSTITUENT	TCLP RESULTS (mg/L)		REGULATORY LEVEL (mg/L)
EPA SAMPLE NUMBER	SBA-03	SBA-04	
Benzene (D018)	1.07	0.53	0.5
Vinyl chloride (D043)	0.28	0.32	0.2

24. The analysis of sludges collected from Water Pits #1-3 and the Oil Pit during the August 24, 1994, CDI identified the following hazardous constituents:

- a. Water Pit #1

Table 3

Constituent	Concentration (mg/kg)
Anthracene	3,150
Phenanthrene	673

- b. Water Pit #2

Table 4

Constituent	Concentration (mg/kg)
Acenaphthene	1,370
Anthracene	4,970
Chrysene	1,020
Fluoranthene	3,110
Fluorene	2,030
Naphthalene	5,730
Phenanthrene	5,910
Pyrene	1,910

- c. Water Pit #3

Table 5

Constituent	Concentration (mg/kg)
Acenaphthlene	571
Anthracene	4,910

Fluoranthene	1,610
Naphthalene	2,010
Phenanthrene	2,380

d. Oil Pit

Table 6

Constituent	Concentration (mg/kg)
Anthracene	2,210
Chrysene	869
Fluoranthene	3,120
Flourene	1,620
Naphthalene	2,480
Phenanthrene	4,700
Pyrene	1,660

25. The hazardous wastes or hazardous constituents in Water Pits #1 - 3 and the Oil Pit may migrate from the Facility into the environment through the soil and the ground water because Water Pits #1 - 3 and the Oil Pit are unlined.
26. Analysis of samples collected from sediment in the drainage ditch adjacent to the Water Pits and the Storage Tanks during the August 24, 1994, CDI identified hazardous constituents shown in Table 7:

Table 7

Constituent	Concentration (mg/kg)
Anthracene	1,270
Chrysene	41.4
Fluoranthene	84
Phenanthrene	435
Methylene chloride	309
Chromium	7.56

February 22, 1994

Mr. F. Stokes

Page -5-

public water supplies. The Chicot is divided into upper and lower zones in this area with the two intervals separated by a relatively continuous clay horizon. The lower Chicot aquifer is apparently brackish to saline in this area and is not used as a drinking water resource. The deeper Evangeline and Jasper aquifers may also be present in the Pliocene age sediments underlying the Chicot, but are also saline in this area.

SITE INVESTIGATION. On December 16, 1993, G&E personnel (Messrs. Randal J. Landry and Michael D. Luckett) conducted the site investigation. Four hand-augered soil exploration borings were installed at selected areas across the site in accordance with G&E's field investigation protocols outlined in Appendix A, the locations of which are shown on Figure 3. Due to the shallow depths of groundwater generally encountered during subsurface investigations in southern Louisiana, all borings were scheduled to a maximum depth of 15 feet. However, groundwater was encountered in only two of the four borings installed.

Soil samples were collected from each boring at 1-foot intervals and visually/manually inspected in the field for evidence of environmental impact and for classification of soil type. New, clean, latex gloves were worn when examining samples for soil classification, characteristics, odor, and visual evidence of petroleum hydrocarbons or other substances of potential environmental concern which may have been used at the site. Soil descriptions are included on the boring logs presented in Appendix B.

Immediately upon collection, portions of each soil sample were placed in an airtight plastic bag. Upon completion of each borehole, the headspace of each bagged sample was screened with a portable photoionization analyzer (HNU). However, an equipment malfunction prevented the screening of samples from borings B-1 and B-2. The maximum HNU value recorded from the samples collected from borings B-3 and B-4 was 7 parts per million (ppm) in the 1- to 2-foot interval from boring B-3. All other HNU values were 1 ppm or less. The result of these field screening tests are presented in Table 1 and on the boring logs in Appendix B.

One soil sample was collected from each boring and was submitted for laboratory analyses for TPH and VOC constituents. Groundwater samples were collected from borings B-1 and B-3 for field analyses (pH, specific conductance, and temperature) and subsequent laboratory analysis. No groundwater accumulated in borings B-2 and B-4 following installation. The field analytical results are included on Table 1. Additionally, five composite surface materials samples were collected at selected locations across the site for analysis.

All samples were placed in clean, laboratory-supplied sample containers provided by G&E's subcontractor, SPL, Inc. (SPL) in Scott, Louisiana, placed on ice, and subsequently transported by SPL courier, following strict chain-of-custody procedures, to SPL for analyses. The analytical laboratory results for the soil and groundwater samples are

February 22, 1994

Mr. F. Stokes

Page -7-

- o Five composite surface materials samples collected from various areas across the site were analyzed for the presence of TPH and RCRA metals. TPH constituents were detected in all samples ranging from a low of 21 milligrams per kilogram (mg/kg) in sample CS-1 to a maximum of 2,100 mg/kg in sample CS-3. Varying concentrations of arsenic, barium, chromium, mercury, lead, and/or selenium were detected above the laboratory practical quantitation limit in all composite samples. No detectable concentrations of cadmium or silver were found in any of the composite samples analyzed.
- o Elevated lead levels were detected in composite samples CS-3 (40 mg/kg) and CS-5 (870 mg/kg). However, the levels of lead and other metals detected by TCLP analysis from composite samples CS-2, CS-3 and CS-5 did not have leachate which was at a level of regulatory concern.

CONCLUSIONS. The following conclusions are made as a result of the findings of the modified Phase I assessment:

- o Based on the TPH and VOC constituent concentrations detected in the soil sample from boring B-2, the hydrocarbon impact at this location may be environmentally significant. The source of these constituents could not be determined in the field as no overt source for these compounds was identified. The benzene concentration detected in boring B-1 does not appear to be significant; the methylene chloride concentrations detected in this boring and boring B-4 may be indicative of a laboratory quality assurance problem.
- o The results of the analyses of the two groundwater samples (B-1 and B-3) indicates historical operations do not appear to have impacted the shallow groundwater resources below the site in the areas sampled. However, site-wide characterization of the groundwater resources at the site, and the degree of impact, if any, from historical site operations cannot be determined due to the limited scope of this investigation.
- o The concentrations of detected metals in the composite soil samples were within the normal range for metals found in soils, except for lead levels, and do not appear to pose an environmental concern. The results of the TCLP analyses of three composite surface materials samples composed principally of abrasive blast materials residue, do not have leachate which exceeds the regulatory action level for the range of metal detected.

RECOMMENDATIONS: Based on the conclusions of the modified Phase I assessment, the following recommendations are made:

- o Solid waste (paint cans, debris, etc.) should be removed and disposed in an appropriate manner.

February 22, 1994

Mr. F. Stokes

Page -6-

summarized in Table 2 through 4. The analytical laboratory report and chain-of-custody document for these samples is included in Appendix C.

The laboratory utilized analytical methods approved by the Louisiana Department of Environmental Quality (LaDEQ). Soil and groundwater samples submitted to SPL were analyzed for TPH by Method 418.1 using U.S. EPA Methods for Chemical Analysis of Water and Wastes, 1983; and for VOCs by Method 8240 using U.S. EPA Test Methods for Evaluating Solid Waste, SW-846, Third Edition, November 1986. Composite soil samples were analyzed for TPH by Method 418.1; and for total RCRA metals and TCLP metals by Methods from the 7000 series using U.S. EPA Test Methods for Evaluating Solid Waste, SW-846, Third Edition, November 1986. In addition to the soil samples analyses, the laboratory report includes quality assurance/quality control data and analytical results for one trip blank sample (2425-WT-1).

Upon completion of sampling activities, all borings were abandoned by placing a thick cement-bentonite grout mix from bottom to surface grade.

REGULATORY RESEARCH. The regulatory agency files review was previously conducted and the findings presented to Cari in a letter reported dated December 7, 1993.

SUMMARY OF FINDINGS. The following is a summary of the findings of the Limited Phase I Environmental Assessment and Site Investigation conducted at the subject property:

- o The results of continuous HNU screening of two soil samples from the hand-augered soil borings did not exceed 7 ppm and were not indicative of the presence of volatile organics. (Two samples were not screened.)
- o Laboratory analysis of the soil sample from boring B-2 detected TPH constituent concentrations of 1,700 milligrams per kilogram (mg/kg). No TPH constituents were detected above the laboratory practical quantitation limit of 10 mg/kg in samples collected from borings B-1, B-3 and B-4.
- o Analyses of soil samples from the borings indicated the presence of varying concentrations of the following VOCs: benzene and methylene chloride (B-1); 2-butanone, ethylbenzene, and xylenes (B-2); and methylene chloride (B-4). No VOCs were detected in boring B-3.
- o Analyses of the groundwater samples collected from borings B-1 and B-3 did not indicate the presence of TPH or VOC constituents above the laboratory practical quantitation limit, except for a 1 milligram per liter (mg/L) concentration of TPH in B-3, which was the quantitation limit for this analysis.

February 22, 1994

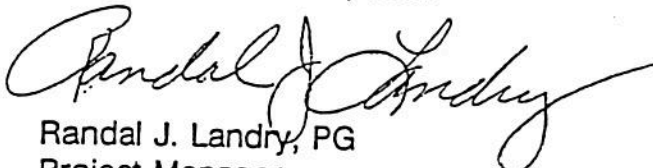
Mr. F. Stokes

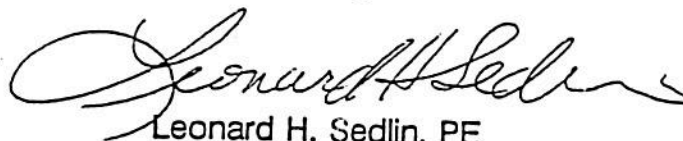
Page -8-

- o Abrasive blasting equipment should be upgraded to contain spent blasting material from escaping the general work area. Upon completion of blasting operations, all spent materials should be stockpiled in a location away from the adjacent Mermentau River pending disposition in a nonhazardous waste landfill following proper materials characterization.
- o Bulk fuel storage areas and the pump station should be properly upgraded with an appropriate containment barrier to prevent runoff from spillage and/or leaks from entering the Mermentau River.
- o Further investigation should be conducted to further define the extent of subsurface hydrocarbon impact in the vicinity of borings B-1, B-2, and B-4.
- o Additional sampling of spent abrasive blasting materials from the area of composite samples CS-3 and CS-5 should be conducted to define the extent of elevated lead concentrations in these areas. Following delineation, spent abrasive materials may have to be removed from the site and disposed in an appropriate non-hazardous waste landfill.
- o Leaking compressors and or other equipment used in the operation of the shipyard should be repaired as necessary to prevent further impact to surface areas from released lubricants.

G&E appreciates the opportunity to be of service to LeeVac Shipyards, Inc. If you have any questions concerning this report, please call either of the undersigned at G&E Engineering, Inc. (504) 292-9007.

Sincerely,
G&E ENGINEERING, INC.


Randal J. Landry, PG
Project Manager


Leonard H. Sedlin, PE
Vice President

./LHS:wc

TABLES

FIGURES

ATTACHMENTS



16 Mecca Drive
Lafayette, LA 70508-3306
Telephone (318) 235-0483

SHERRY LABORATORIES
INDIANA LOUISIANA OKLAHOMA
James Laboratories

P.O. Box 81816
Lafayette, LA 70598-1816
Fax 318-233-6540
800-737-2378

LAB I.D. 9603606-01A

DATE REPORTED: 04/16/96

SAMPLE DESCRIPTION SBA - SAMPLE A

DATE COLLECTED: 03/28/96 11:30

Sherry Landry
Laboratory Representative

DATE EXTRACTED 04/05/96 DATE INJECTED 04/11/96 ANALYST GMC METHOD EPA 625

<u>COMPOUND</u>	<u>RESULT</u>	<u>COMPOUND</u>	<u>RESULT</u>
benzoic acid	<u>ND</u>	2-nitrophenol	<u>ND</u>
2-chlorophenol	<u>ND</u>	4-nitrophenol	<u>ND</u>
2,4-dichlorophenol	<u>ND</u>	p-chloro-m-cresol	<u>ND</u>
2,4-dimethylphenol	<u>ND</u>	pentachlorophenol	<u>ND</u>
2,4-dinitrophenol	<u>ND *</u>	phenol	<u>0.47</u>
2-methyl-4,6-dinitro-phenol	<u>ND **</u>	tetrachlorophenol	<u>ND</u>
2-methyl phenol	<u>0.36</u>	2,4,5-trichlorophenol	<u>ND</u>
4-methyl phenol	<u>0.23</u>	2,4,6-trichlorophenol	<u>ND</u>

All results reported in ppm unless otherwise specified.

ND = not detected at 0.20 ppm
ND* = not detected at 0.40 ppm
ND** = not detected at 1.0 ppm

SURROGATE RECOVERIES (%)

PHENOL-D5 ND
2-FLUOROPHENOL ND
2,4,6-TRIBROMOPHENOL ND



SHERRY LABORATORIES

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116 Mecca Drive
Lafayette, LA 70508-3306
Telephone (318) 235-0483

LAB I.D. 9603606-01A DATE REPORTED: 04/16/96

SAMPLE DESCRIPTION SBA - SAMPLE A

DATE COLLECTED: 03/28/96 11:30

James Landrum
Laboratory Representative

ANALYST GMC Date Extracted: 04/05/96 Date Analyzed: 04/11/96 Method: EPA 625

COMPOUND	RESULT	COMPOUND	RESULT	COMPOUND	RESULT
acenaphthene	<u>0.51</u>	4-chlorophenyl phenyl ether	<u>ND</u>	hexachlorocyclopentadiene	<u>ND</u>
acenaphthylene	<u>ND</u>	chrysene	<u>ND</u>	hexachloroethane	<u>ND</u>
aniline	<u>ND</u>	dibenzo (a,h) anthracene	<u>ND*</u>	indeno (1,2,3-cd) pyrene	<u>ND*</u>
anthracene	<u>1.6</u>	dibenzofuran	<u>0.48</u>	isophorone	<u>ND</u>
benzidine	<u>ND</u>	1,2 dichlorobenzene	<u>ND</u>	2-methylnaphthalene	<u>0.69</u>
benzo (a) anthracene	<u>0.37</u>	1,3 dichlorobenzene	<u>ND</u>	naphthalene	<u>5.1</u>
benzo (a) pyrene	<u>ND</u>	1,4 dichlorobenzene	<u>ND</u>	2-nitroaniline	<u>ND</u>
benzo (b) fluoranthene	<u>ND</u>	3,3 dichlorobenzidine	<u>ND</u>	3-nitroaniline	<u>ND</u>
benzo (ghi) perylene	<u>ND*</u>	diethyl phthalate	<u>ND</u>	4-nitroaniline	<u>ND</u>
benzo (k) fluoranthene	<u>ND</u>	dimethyl phthalate	<u>ND</u>	nitrobenzene	<u>ND</u>
benzyl alcohol	<u>ND</u>	di-n-butyl phthalate	<u>ND</u>	N-nitrosodimethylamine	<u>ND</u>
benzylbutyl phthalate	<u>ND</u>	dinitrobenzene	<u>ND</u>	N-nitrosodiphenylamine	<u>ND</u>
2-(2-chloroethoxy)methane	<u>ND</u>	2,4-dinitrotoluene	<u>ND</u>	N-nitrosodipropylamine	<u>ND</u>
bis (2-chloroethyl) ether	<u>ND</u>	2,6-dinitrotoluene	<u>ND</u>	phenanthrene	<u>ND</u>
2-chloroisopropyl ether	<u>ND</u>	di-n-octyl phthalate	<u>ND</u>	2-picoline	<u>ND**</u>
2-ethylhexyl phthalate	<u>ND</u>	1,2-diphenylhydrazine	<u>ND</u>	pyrene	<u>0.61</u>
4-chlorophenyl phenyl ether	<u>ND</u>	fluoranthene	<u>0.83</u>	pyridine	<u>ND**</u>
carbazole	<u>ND</u>	fluorene	<u>0.71</u>	tetrachlorobenzene (s)	<u>ND</u>
4-chloroaniline	<u>ND</u>	hexachlorobenzene	<u>ND</u>	toluendiamine	<u>ND</u>
2-chloronaphthalene	<u>ND</u>	hexachlorobutadiene	<u>ND</u>	1,2,4 trichlorobenzene	<u>ND</u>

SURROGATE RECOVERIES (%)

2-fluorobiphenyl ND
nitrobenzene-d5 ND
terphenyl-d14 ND

All results reported in ppm unless otherwise specified.

ND = not detected at detection limit 0.20 ppm
ND * = not detected at detection limit 0.40 ppm
ND ** = not detected at detection limit 1.0 ppm



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800-737-2378

LAB I.D. 9603606-01A DATE REPORTED: 04/16/96

SAMPLE DESCRIPTION SBA - SAMPLE A

DATE COLLECTED: 03/28/96 11:30

James Landrum
LABORATORY REPRESENTATIVE

ANALYST GAC Date Analyzed: 04/04/96 Method KPA 624

COMPOUND	RESULT	COMPOUND	RESULT	COMPOUND	RESULT
acetone	<u>BDL</u>	chloromethane	<u>BDL</u>	paraaldehyde	<u>BDL</u>
acrolein	<u>BDL</u>	dichlorodifluoromethane	<u>BDL</u>	styrene	<u>BDL</u>
acrylonitrile	<u>BDL</u>	1,1-dichloroethane	<u>BDL</u>	1,1,2,2-tetrachloroethane	<u>BDL</u>
benzene	<u>1.5</u>	1,2-dichloroethane	<u>BDL</u>	tetrachloroethylene	<u>BDL</u>
is (chloromethyl) ether	<u>BDL</u>	1,1-dichloroethylene	<u>BDL</u>	toluene	<u>1.3</u>
bromodichloromethane	<u>BDL</u>	1,2-trans-dichloroethylene	<u>BDL</u>	1,1,1-trichloroethane	<u>BDL</u>
bromoform	<u>BDL</u>	1,2-dichloropropane	<u>BDL</u>	1,1,2-trichloroethane	<u>BDL</u>
bromomethane	<u>BDL</u>	cis-1,3-dichloropropylene	<u>BDL</u>	trichloroethylene	<u>BDL</u>
carbon disulfide	<u>BDL</u>	trans-1,3-dichloropropylene	<u>BDL</u>	vinyl acetate	<u>BDL</u>
carbon tetrachloride	<u>BDL</u>	ethylbenzene	<u>BDL</u>	vinyl chloride	<u>BDL</u>
chlorobenzene	<u>BDL</u>	fluorotrichloromethane	<u>BDL</u>	o-xylene	
chlorodibromomethane	<u>BDL</u>	2-hexanone	<u>BDL</u>	m-xylene TOTAL	<u>1.9</u>
chloroethane	<u>BDL</u>	methylene chloride	<u>1.4</u>	p-xylene	
chloroethylvinyl ether	<u>BDL</u>	methyl-isobutyl-ketone	<u>BDL</u>	1,2 dichlorobenzene	<u>BDL</u>
chloroform	<u>BDL</u>	methyl-ethyl-ketone	<u>BDL</u>	1,3 dichlorobenzene	<u>BDL</u>
				methyl methacrylate	<u>BDL</u>

All results reported in ppm unless otherwise specified.
ND = not detected at detection limit 1.0 ppm

ND** = not detected at 50 ppb
ND* = not detected at 100 ppb

SURROGATE RECOVERIES	(%)
1,2 DICHLOROETHANE-D4	<u>107</u>
TOLUENE-D8	<u>100</u>
BROMOFLUOROBENZENE	<u>92</u>



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LAB I.D. 9603606-02A DATE REPORTED: 04/16/96

SAMPLE DESCRIPTION SBA - SAMPLE B

DATE COLLECTED: 03/28/96 12:45

James Landry
Laboratory Representative

DATE EXTRACTED 04/05/96 DATE INJECTED 04/11/96 ANALYST GMC METHOD EPA 625

COMPOUND RESULT

benzoic acid ND

2-chlorophenol ND

2,4-dichlorophenol ND

2,4-dimethylphenol ND

2,4-dinitrophenol ND *

methyl-4,6-dinitro-phenol ND **

2-methyl phenol ND

4-methyl phenol ND

COMPOUND RESULT

2-nitrophenol ND

4-nitrophenol ND

p-chloro-m-cresol ND

pentachlorophenol ND

phenol ND

tetrachlorophenol ND

2,4,5-trichlorophenol ND

2,4,6-trichlorophenol ND

All results reported in ppm unless otherwise specified.

ND = not detected at 50 ppm

ND* = not detected at 100 ppm

ND** = not detected at 200 ppm

SURROGATE RECOVERIES (%)

PHENOL-D5 ND

2-FLUOROPHENOL ND

2,4,6-TRIBROMOPHENOL ND



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AB I.D. 9503606-02A DATE REPORTED: 04/16/96

AMPLE DESCRIPTION SBA - SAMPLE B

DATE COLLECTED: 03/28/96 12:45

Jerry London
Laboratory Representative

ANALYST GMC Date Extracted: 04/05/96 Date Analyzed: 04/11/96 Method: EPA 625

COMPOUND	RESULT	COMPOUND	RESULT	COMPOUND	RESULT
acenaphthene	150	4-chlorophenyl phenyl ether	ND	hexachlorocyclopentadiene	ND
acenaphthylene	ND	chrysene	ND	hexachloroethane	ND
aniline	ND	dibenzo (a,h) anthracene	ND*	indeno (1,2,3-cd) pyrene	ND*
anthracene	550	dibenzofuran	120	isophorone	ND
benzidine	ND	1,2 dichlorobenzene	ND	2-methylnaphthalene	160
benzo (a) anthracene	ND	1,3 dichlorobenzene	ND	naphthalene	810
benzo (a) pyrene	ND	1,4 dichlorobenzene	ND	2-nitroaniline	ND
benzo (b) fluoranthene	ND	3,3 dichlorobenzidine	ND	3-nitroaniline	ND
benzo (ghi) perylene	ND*	diethyl phthalate	ND	4-nitroaniline	ND
benzo (k) fluoranthene	ND	dimethyl phthalate	ND	nitrobenzene	ND
benzyl alcohol	ND	di-n-butyl phthalate	ND	N-nitrosodimethylamine	ND
benzylbutyl phthalate	ND	dinitrobenzene	ND	N-nitrosodiphenylamine	ND
(2-chloroethoxy)methane	ND	2,4-dinitrotoluene	ND	N-nitrosodipropylamine	ND
1a (2-chloroethyl) ether	ND	2,6-dinitrotoluene	ND	phenanthrene	ND
1-chlorisopropyl ether	ND	di-n-octyl phthalate	ND	2-picoline	ND**
1-ethylhexyl phthalate	ND	1,2-diphenylhydrazine	ND	pyrene	220
1-methoxyphenyl phenyl ether	ND	fluoranthene	280	pyridine	ND**
carbazole	ND	fluorene	180	tetrachlorobenzene (s)	ND
4-chloroaniline	ND	hexachlorobenzene	ND	toluendiamine	ND
2-chloronaphthalene	ND	hexachlorobutadiene	ND	1,2,4 trichlorobenzene	ND

SURROGATE RECOVERIES (3)

2-fluorobiphenyl ND
nitrobenzene-d5 ND
terphenyl-d14 ND

All results reported in ppm unless otherwise specified.

ND = not detected at detection limit 50 ppm
ND * = not detected at detection limit 100 ppm
ND ** = not detected at detection limit 200 ppm



116 Mecca Drive
Lafayette, LA 70508-3306
Telephone (318) 235-0483

SHERRY LABORATORIES
INDIANA LOUISIANA OKLAHOMA
James Laboratories

P.O. Box 81816
Lafayette, LA 70598-1816
Fax 318-233-6540
800-737-2378

LAB I.D. 9603606-02A DATE REPORTED: 04/16/96

SAMPLE DESCRIPTION SBA - SAMPLE B

DATE COLLECTED: 03/28/96 12:45

James Landry
LABORATORY REPRESENTATIVE

ANALYST GMC Date Analyzed: 04/04/96 Method EPA 624

<u>COMPOUND</u>	<u>RESULT</u>	<u>COMPOUND</u>	<u>RESULT</u>	<u>COMPOUND</u>	<u>RESULT</u>
acetone	<u>BDL</u>	chloromethane	<u>BDL</u>	paraldehyde	<u>BDL</u>
acrolein	<u>BDL</u>	dichlorodifluoromethane	<u>BDL</u>	styrene	<u>BDL</u>
acrylonitrile	<u>BDL</u>	1,1-dichloroethane	<u>BDL</u>	1,1,2,2-tetrachloroethane	<u>BDL</u>
benzene	<u>2.7</u>	1,2-dichloroethane	<u>BDL</u>	tetrachloroethylene	<u>4.1</u>
bis (chloromethyl) ether	<u>BDL</u>	1,1-dichloroethylene	<u>BDL</u>	toluene	<u>2.9</u>
bromodichloromethane	<u>BDL</u>	1,2-trans-dichloroethylene	<u>BDL</u>	1,1,1-trichloroethane	<u>BDL</u>
bromoform	<u>BDL</u>	1,2-dichloropropane	<u>BDL</u>	1,1,2-trichloroethane	<u>BDL</u>
bromomethane	<u>BDL</u>	cis-1,3-dichloropropylene	<u>BDL</u>	trichloroethylene	<u>BDL</u>
carbon disulfide	<u>BDL</u>	trans-1,3-dichloropropylene	<u>BDL</u>	vinyl acetate	<u>BDL</u>
carbon tetrachloride	<u>BDL</u>	ethylbenzene	<u>1.7</u>	vinyl chloride	<u>BDL</u>
chlorobenzene	<u>BDL</u>	fluorotrichloromethane	<u>BDL</u>	o-xylene	
chlorodibromomethane	<u>BDL</u>	2-hexanone	<u>BDL</u>	m-xylene TOTAL	<u>7.7</u>
chloroethane	<u>BDL</u>	methylene chloride	<u>BDL</u>	p-xylene	
?-chloroethylvinyl ether	<u>BDL</u>	methyl-isobutyl-ketone	<u>BDL</u>	1,2 dichlorobenzene	<u>BDL</u>
chloroform	<u>BDL</u>	methyl-ethyl-ketone	<u>BDL</u>	1,3 dichlorobenzene	<u>BDL</u>
				methyl methacrylate	<u>BDL</u>

All results reported in ppm unless otherwise specified.
ND = not detected at detection limit 1.0 ppm

ND** = not detected at 50 ppb
ND* = not detected at 100 ppb

SURROGATE RECOVERIES	(%)
1,2 DICHLOROETHANE-D4	<u>106</u>
TOLUENE-D8	<u>102</u>
BROMOFLUOROBENZENE	<u>97</u>

ATTACHMENT “B”

[illegible]

PREPARED B Gene Keeper

DATE April 6, 1999

REVIEWED B

DATE _____

Ree M. Dwyer
7/8/92

PROJECT													TOTAL
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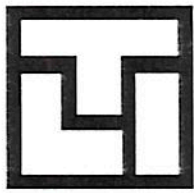
PREPARED B Gene Keeper

DATE April 6, 1999

REVIEWED B

VIEWED B : Rea Welling
DATE : 7/5/99

DATE _____



TECHLAW INC.

750 NORTH ST. PAUL STREET, SUITE 600, DALLAS, TEXAS 75201

PHONE: (214) 953-0045

FAX: (214) 754-0819

April 23, 2002

RZ2-R05701.06-EP-108

Ms. Rena McClurg
Regional Project Officer
U.S. EPA Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Reference: Contract 68-W-99-017; EPA Work Assignment No. R06708: SBA Shipyards;
Notification of Completion

Dear Ms. McClurg:

TechLaw, Inc. (TechLaw), is notifying EPA that TechLaw has completed and submitted all the technical deliverables under this work assignment. Although it has completed all technical deliverables, for the next 30 to 60 days, TechLaw will continue to process trailing costs during close-out activities. After processing all trailing costs, TechLaw will submit a Work Assignment Closeout Notification to EPA.

If you need additional information, please contact me at (214) 572-0072.

Sincerely,

Debra Pandak
Regional Manager

cc: G. Keepper, EPA WAM
W. Jordan, TL Central Files
Dallas Files



750 NORTH ST. PAUL STREET, SUITE 600, DALLAS, TX 75201

TECHLAW INC.

PHONE: (214) 953-0045

FAX: (214) 754-0819

August 20, 1999

RZ2-R06708.01-WP-003

Ms. Rena McClurg
Regional Project Officer
EPA Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75201

Reference: Contract No. 68-W-99-017; Work Assignment No. R06708; SBA
Shipyards, Jennings, LA; EPA I.D. No. LAD008434185; Corrective Action
Order Development and Oversight Assistance; Work Plan, Revision 0

Dear Ms. McClurg:

Attached please find the work plan for the above referenced work assignment. This work plan is being submitted in accordance with the Statement of Work dated June 11, 1999. A scoping meeting was held on August 4, 1999 and subsequent telephone conversations were held between Phebe Davol and the EPA WAM, Mr. Gene Keeper. **The LOE estimated for this project is 1911. The total associated cost is \$140,633.** LOE and costs include those for subcontractor Metcalf & Eddy.

TechLaw has conducted a thorough Conflict of Interest (COI) screening at both the corporate level and for the personnel proposed for this project. Please refer to Section VI of this document for further details.

In accordance with the procedures for this contract, if the Contracting Officer has not provided written approval of this work plan as soon as possible. **TechLaw will stop work on this work assignment if approval is not received by September 29, 1999 or upon reaching 90% of the funded budget.** In these cases, TechLaw will not resume work until the Contracting Officer approves the Work Plan.



Ms. Rena McClurg
August 20, 1999
Page 2

Please contact me or the TechLaw Work Assignment Manager, Phebe Davol, at 254/793-3419 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Debra Pandak', with a stylized, cursive script.

Debra Pandak
Regional Manager

cc: J. Thurman, EPA CO
G. Keepper, EPA Region 6 WAM
W. Jordan
P. Davol
S. Irving, M&E
Dallas Files

**SBA SHIPYARDS
Jennings, Louisiana**

Corrective Action Order Development and Oversight Assistance

WORK PLAN

Revision 0

Submitted to:

Ms. Rena McClurg
Regional Project Officer
U.S. Environmental Protection Agency
Region 6
1440 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Submitted by:

TechLaw, Inc.
750 N. St. Paul Street
Suite 600
Dallas, Texas 75201

EPA Work Assignment No.	: R06708
Contract No.	: 68-W-99-017
TechLaw WAM	: Phebe Davol
Telephone No.	: 254/793-3419
EPA WAM	: Gene Keepper
Telephone No.	: 214/665-2280

August 20, 1999

SBA SHIPYARDS

WORK PLAN

Revision 0

TABLE OF CONTENTS

	PAGE
I. INTRODUCTION	1
II. TECHNICAL APPROACH	1
III. TASK DESCRIPTION	3
Task 01	3
Task 02	3
Task 03	4
Task 04	4
Task 05	5
Task 06	5
Task 07	6
Task 08	6
Task 09	6
Task 10	7
IV. PERFORMANCE SCHEDULE AND DELIVERABLES	7
V. PERSONNEL	8
VI. CONFLICT OF INTEREST CERTIFICATION	11
VII. EXCEPTIONS/ANTICIPATED PROBLEMS	12
VIII. QUALITY ASSURANCE	12
IX. ANTICIPATED LEVEL OF EFFORT	12
X. COST ESTIMATE	12
XI. SUBCONTRACT PLAN	12
XII. HEALTH AND SAFETY PLAN	13
XIII. GOVERNMENT FURNISHED DATA	13

ATTACHMENTS

I.	SCHEDULE
II.	STAFF RESPONSIBILITY CHART
III.	LEVEL OF EFFORT ESTIMATE
IV-a.	ESTIMATED TRAVEL COST TABLE
IV-b.	WORKSHEET FOR TRAVEL CALCULATIONS
V.	ESTIMATED COST
VI.	ATYPICAL ODC ESTIMATES

I. INTRODUCTION

Background

SBA Shipyards, Inc. (SBA) consists of approximately 97 acres located on the Mermentau River, 9040 Castex Landing, at the end of LA Hwy. 3166, Jefferson Davis Parish, Jennings, LA. During August 23-25, 1994 the RCRA Enforcement Branch inspected SBA. PRC Environmental Management Inc., (PRC, now Tetra Tech Environmental Management, Inc.) (TTEM) provided sampling support. On March 22, 1995 EPA and TTEM returned to SBA to sample the site. Prior to EPA involvement at SBA, the Solid Waste, Ground Water Protection, and Hazardous Waste Divisions of the Louisiana Department of Environmental Quality (LDEQ) had dealt with SBA since February 1990. Three sampling events, one in 1989, another in 1993, and the third in 1996, have been conducted at SBA by consultants to SBA, their counsel, or lessee. Several land-based units (i.e., surface impoundments, landfarm, and ditches) exist on the site and hold or have held sludges removed from barges. The sludges are primarily petroleum based, however, solvents have also been detected. Detected constituents in soils and sludges are primarily semi-volatile organic compounds at concentrations in the 10 to 1000 mg/kg range. In addition, volatile organic compounds detected in sludges are in the 10 to 100 mg/kg range. RCRA metals (e.g., lead, chromium) have also been detected on the north side of the plant. There is also suspected separate phase [non-aqueous phase liquids (NAPL)] in the groundwater at the site. EPA is drafting a RCRA §3008(h) Final Consent Order (FCO) to address the complete investigation and remediation of this site.

The Final Consent Order (FCO) will require SBA to undertake and complete corrective action activities to the satisfaction of EPA. SBA shall implement and complete the Interim Measures (IM), RCRA Facility Investigation (RFI), and Corrective Measures Study (CMS) programs in accordance with the FCO and applicable EPA approved work plans. SBA shall conduct any additional work EPA requires in accordance with the FCO. The original wording for the Statement of Work indicated that all tasks listed in the Phase I should be completed by September 1999 if fully funded. During the scoping meeting, Mr. Keepper indicated that the scope of work was actually drafted earlier in 1999 and therefore the schedule for this requirement can be altered. TechLaw will, however, strive to complete these tasks as quickly as possible.

II. TECHNICAL APPROACH

A scoping meeting was held with Mr. Gene Keepper, the EPA Work Assignment Manager (EPA WAM) on August 4, 1999. The purpose of the meeting was to discuss the scope of the project. During this meeting Mr. Keepper provided Ms. Davol with a description of the background and the objectives of the work assignment.

Phebe Davol will be the TechLaw Work Assignment Manager (TWAM) for this work assignment. Ms. Davol will ensure that appropriate staff are selected for each task. The TWAM will participate in and oversee the completion of the tasks encompassed in this work assignment. Technical staff with applicable education, background, and experience have been assigned to each task.

TechLaw will complete the tasks which are included in the performance period ending September 30, 2000:

Phase I

- Develop a work plan to encompass all the tasks in the Statement of Work.
- Develop a generic Quality Assurance Project Plan (QAPP).
- Meet with the EPA WAM as needed for project development.
- Conduct a facility file review and background information review.
- Review and comment on submittals provided by SBA currently in possession of EPA (i.e., IM, RFI, Ground Water Remediation and Monitoring CMS, and CMI Work Plans/Reports) for technical accuracy, completeness, adequate quality assurance and quality control (QA/QC) procedures and sufficiency.
- Provide monthly progress reports to EPA.

Phase II

- Review and comment on submittals required by the FCO, or otherwise provided by SBA (i.e., IM, RFI, CMS Work Plans/Reports) for technical accuracy, completeness, adequate quality assurance and quality control (QA/QC) procedures and sufficiency.
- Observe Facility ground water monitoring well installations, observe Facility ground water sampling events, conduct ground water monitoring well split sampling events, observe Facility soil sampling events, conduct soil sampling split sample events, and develop and transmit reports to EPA documenting all of the above activities.
- Assist with public involvement activities.
- Maintain an administrative record of corrective action activity documents associated with the site; and upon written technical direction by EPA, conduct an independent geological/hydrogeological assessment of the Facility utilizing available information.

III. TASK DESCRIPTION

The following section summarizes the tasks anticipated to be completed under this work plan.

Phase I -Tasks

Task 01 - Work Plan and Generic QAPP (SOW Ref. 3.1.1)

Task 01 includes work plan development and revisions and associated cost estimates. This task also includes development of a QAPP which encompasses the entire project. The QAPP addresses all elements of project Quality Assurance and Quality Control and generically addresses QA/QC related to sampling and laboratory analyses. When sampling and analyses is necessary, an event specific QAPP will be prepared as described under Task 05. This work plan provides a separate Level of Effort (LOE) and cost estimates for each individual task included in this work plan. The Work Plan submitted by TechLaw shall be amended as necessary to meet the needs of the project.

Task 02 - Project Management (SOW Ref. 3.1.2)

TechLaw will supply personnel, services, materials and equipment necessary to adequately and properly manage this work assignment. Per the EPA SOW, resources utilized for this task shall not be greater than 10% of the approved work plan for level-of-effort hours and cost/fee. Considered as project management are the following: 1) meetings, phone calls, e-mails, correspondence and any other interaction with EPA related to the completion of this work assignment; 2) preparation of monthly technical and financial reports; and 3) any ad hoc reporting related to this work assignment required by EPA.

Information regarding the status of the project will be included in monthly progress reports TechLaw, Inc. provides to EPA. The information will address:

- Work completed to date;
- Difficulties encountered and remedial action taken;
- Anticipated activity during the subsequent reporting period; and,
- Sufficiency of authorized dollars and hours to complete the project.

This task also consists of coordination meetings held between the TechLaw Team and EPA technical staff to discuss current and future issues related to this case and the SOW. Work assignment closeout activities are also included under this task.

Task 03 - Initial Document and File Review (SOW Ref. 3.1.3)

- Conduct a detailed review of background information and facility files in EPA's possession.
- Review and comment on submittals provided by SBA currently in EPA's possession (i.e., IM, RFI, Ground Water Remediation and Monitoring, CMS, and CMI Work Plans/Reports) for technical accuracy, completeness, adequate quality assurance and quality control (QA/QC) procedures and sufficiency.
- Be familiar with the Draft Consent Order.

Ms. Davol and Mr. Keeper discussed the reports which EPA has provided to TechLaw as part of the scoping of this project. There appears to be an interrelatedness between all the documents. Mr. Keeper and Ms. Davol decided to review all of the documents at one time since this would be the most efficient use of the time and will provide the most meaningful set of comments so the project can move forward as expeditiously as possible. The documents are as follows:

- RCRA Facility Investigation Work Plan (October 1996)
- Interim Site Stabilization Measures Work Plan (October 1996)
- Ground Water Remediation and Monitoring Plan (October 1996)
- Corrective Measures Study Work Plan and Closure Alternative Identification Work Plan Implementation Schedule and Cost Estimate (Draft CM Plan) (October 1996)
- Corrective Measures Implementation Plan-Surface Impoundments, Tanks, and Land Treatment Unit and Closure and Post-Closure Implementation Schedule and Cost Estimate (October 1996)
- Application for Corrective Action Management Unit (CAMU) (October 1996)

Phase II Tasks

Task 04 - Technical Review of Workplans and Reports (SOW Ref. 3.2.1)

TechLaw will review and provide comments on all RFI, CMS, and IM submittals (e.g., draft workplans, reports, and data) from the facility for technical accuracy, completeness, adequate QA/QC procedures, and sufficiency. TechLaw will provide as required by EPA, independent technical evaluations (e.g., geologic interpretations, engineering evaluations, modeling, etc.) of data provided by SBA. The documents for this task will consist of reports, plans, etc., which may be submitted in response to comments generated on documents described under Task 03.

Task 05 - Sampling Events (SOW Ref. 3.2.2)

As directed by Mr. Keepper during the scoping meeting, LOE and associated costs are not included in this work plan at this time.

Upon written technical direction from EPA, TechLaw will be required to conduct split or lead sampling events. TechLaw will:

- Provide oversight (e.g., adherence to the facility QAPP, specific sampling methodologies, etc.) and split samples, with adequate QC sample collection, during Facility lead sampling events.
- Review and comment on the adequacy of sample locations and sample depths.
- Conduct lead sampling event(s) to obtain waste or media specific samples including adequate QC sample collection (e.g., collection of correct number of duplicate, trip blank, equipment blank samples and extra volumes required for laboratory quality control analyses).
- Arrange for a suitable laboratory to provide analytical services (e.g., soil sample analyses for 40 CFR Part 261 Appendix VIII constituents, ground water samples for analyses for 40 CFR Part 264 Appendix IX constituents, etc.) in accordance with EPA methods specified in SW-846, 3rd Edition, as amended by Update I, II, IIA, IIB, and III as appropriate. This shall include, but not be limited to:
 - a) Providing QA/QC documentation for analytical data in accordance with the EPA Contract Laboratory Program (CLP) requirements for enforceable data in accordance with Exhibits E and F of both Statements of Work for Organic Analysis (EPA-540/R-94/073, OLM03.1) and Inorganics Analysis, Multi-media Multi-concentration (EPA/540/R95/121, ILMO4.0). The data must be of a quality to support adversarial litigation in a court of law:
 - b) Arrange to ship samples in a manner adhering to Department of Transportation (DOT) requirements to the laboratory for sample analysis after each sampling events.
 - c) Arrange for disposal of sampling derived waste on site or through a commercial Treatment Storage and Disposal (TSD) facility.
- Finalize the generic QAPP described in Phase I (Task 01) for each specific sampling event. Analytical test methods utilized for organic and inorganic chemicals are to be as prescribed in Test Methods for Evaluating Solid Waste, Third Edition, SW-846.

Task 06 - Public Involvement Activities (SOW Ref.3.2.3)

As directed by Mr. Keepper, during the scoping meeting, LOE and associated costs are not included in this work plan at this time.

Upon written technical direction by EPA, TechLaw will provide assistance for public involvement activities with the corrective action process. Public involvement activities shall consist of at least one open house and one public meeting. The assistance will include development of community mailing lists, coordinating logistics for public meetings, preparation of visual aids, and conducting community interviews/surveys. TechLaw will be prepared to conduct site visits in support and development of public involvement activities.

Task 07 - Administrative Records (SOW Ref. 3.2.4)

TechLaw will maintain and update an administrative record for all existing documents related to the corrective action activities for the site. The file shall contain original or copied existing documents arranged in chronological order. The administrative record will include an index of the documents with the document title, document type, author, and author organization, and other fields as specified by EPA. The index will be provided in both a paper format and as a computer file compatible with existing EPA databases. The EPA WAM shall notify TechLaw through written technical direction to deliver copies as required by the government or to amend the administrative record, if necessary. For the purposes of estimating the LOE and associated costs, the Administrative Record is assumed to be 6,000 pages (as discussed with the EPA WAM).

Task 08 - PC-Based Imaging/Full Text Retrieval System (SOW Ref. 3.2.5)

Upon receipt of written technical direction from EPA, TechLaw will retrieve documents from EPA, the State of Louisiana, the Parish of Jefferson Davis, the City of Jennings, and other entities, and incorporate them into an PC-based imaging/full text retrieval system. This system shall provide a computer based index to the documents that are imaged as well as a notation within the index which indicates where the imaged documents exist in hard copy format. Upon written technical direction by EPA, TechLaw shall produce and transmit to EPA hard paper copies of the documents contained in the PC-based imaging/full text retrieval system and/or any computer/optical disks. Based on discussions with Mr. Keeper the estimated page number has increased from 5,000 to 6,000 pages of documents from the above files that will need to be incorporated into the system.

Task 09 - Environmental Sample Analytical Results Database (SOW Ref. 3.2.6)

Upon written technical direction by EPA, TechLaw shall obtain environmental analytical results from EPA and develop and maintain a computerized analytical results database. This database shall include fields for the sample number, case number, date sampled, media sampled, sample location, analytical lab, constituents, and concentrations. Upon written technical direction by EPA, TechLaw shall add new sample results to the database, modify the database to include additional fields, analyze the database information or produce and analyze custom reports in specified formats.

Upon receipt of written technical direction from EPA, TechLaw will prepare and submit any of the following deliverables: one paper copy of summary reports which contain all or part of the sample results contained in the database; and a PC-based menu-driven analytical summary database on computer disks with accompanying support manual.

During the scoping meeting, Mr. Keeper indicated there are approximately ten (10) inches of data. Assuming 200 pages per inch, there are potentially 2,000 individual pages which contain analytical data. This assumption was used to develop the cost estimate.

Task 10 - Independent Geological/Hydrogeological Assessment (SOW Ref. 3.2.7)

Upon written technical direction by EPA, TechLaw will conduct an independent geological and hydrogeological assessment of the Facility utilizing available information consisting of soil boring logs, ground water pump tests, ground water monitoring well logs, geophysical logs, analytical results, and historical workplans/reports and any other available data. TechLaw will meet with EPA to discuss the specific requirements of this task. Based on discussions held during the scoping meeting, areas of expertise for this task include staff knowledgeable in engineering design of landfills and other remedial technologies, experienced in remedial technology cost estimating, and staff capable of performing hydrogeological analyses.

IV. PERFORMANCE SCHEDULE AND DELIVERABLES

See Attachment I for task specific scheduling. All work to be performed under this work assignment will be completed within the period of performance defined as:

Period of Performance
Effective Date: July 22, 1999
Completion Date: September 30, 2000

The deliverables to be submitted to EPA in accordance with this work assignment include the following:

<u>Document</u>	<u>Date/Frequency</u>	<u>Recipient</u>
Work Plan	August 13, 1999, Revised as necessary	EWAM, RPO, CO
Work Assignment Progress Reports	20 th day after end of reporting period	EWAM, RPO, CO

<u>Document</u>	<u>Date/Frequency</u>	<u>Recipient</u>
Work Assignment Description	If directed by EPA RPO	RPO, CO
75/90% Notification	Upon completion of 75/90% LOE or cost estimate	EWAM, RPO, CO

V. PERSONNEL

The following personnel are proposed to participate in this work assignment. A brief description of the qualifications of the key personnel proposed for this work assignment is presented below. Staff availability may vary during the course of the performance of this work assignment and it may be necessary to substitute staff. If this is determined necessary, staff personnel with comparable experience, qualifications, and professional level will be assigned to this work assignment.

Name: Phebe Davol

Role: Work Assignment Manager/Technical Staff

P-level: P4

Qualifications: Ms. Davol is a certified professional soil scientist with over 15 years experience in soil and groundwater investigations, risk assessments, environmental engineering and hazardous waste management. She has prepared sampling and analyses plans and conducted sampling for all types of media and parameters. She has reviewed technologies for remediating contaminated soil and groundwater and has managed projects requiring public involvement activities (e.g., informational meetings, public hearings, etc.). She has prepared administrative records, summarized comments and prepared responsiveness summaries for RCRA Corrective Action Permit Modifications. She is qualified to conduct sampling per compliance with the 29 CFR Part 1910 OSHA Rule and has had the 8-hour refresher and supervisor's training.

Name: Debra Pandak

Role: Regional Manager

P-level: P4

Qualifications: Ms. Pandak is an environmental scientist with over 14 years experience managing, supervising, developing, and supporting hazardous waste site investigations and providing technical support to remediation projects, permit reviews, community relations, property assessments, and environmental policy analysis projects. She worked on various EPA contracts including FIT, ARCS and REPA collecting multi-media samples including surface water, sediment, groundwater, air and soil.

Name: Mohamed Nur
Role: Technical Staff
P-level: P3

Qualifications: Mr. Nur has extensive experience in various RCRA program areas, including corrective action and permitting. His field of experience includes conducting RCRA Facility Assessments (RFAs), RCRA Facility Investigation (RFI) reviews, Corrective Measures Study (CMS) reviews, Part B permit application preparation and reviews, RFI/IM (Interim Measures) oversight, landfill cover engineering design reviews and soil, surface and groundwater sampling and modeling. Mr. Nur has reviewed numerous technical documents including pre-RFI Assessment Summary reports; RFI proposals and reports; CMS proposals; stabilization plans/reports; CMS reports; Preliminary, Pre-final and Final Design reports; Quality Assurance/Quality Control (QA/QC) sections of SLERs and FMLERs; Part B Permit Application and Subpart X applications for open burning/open detonation (OB/OD). He has participated in a project that involved determining the off-site impact from air releases generated from contaminated subsurface soil.

Name: Greg Starkebaum
Role: Technical Staff
P-Level: P-4

Qualifications: Mr. Starkebaum is a Registered Civil and Environmental Engineer with in-depth government and private environmental consulting experience. His background includes water and wastewater transfer and treatment system design; related construction inspection, enforcement and permitting work for State and Federal solid and hazardous waste programs; and RCRA/CERCLA compliance assistance to major private and government clients. He has written permit conditions for landfill, impoundment, tank, container, and miscellaneous units, including, regional solid and hazardous waste treatment, storage, and disposal facilities, the DOE Waste Isolation Pilot Plant, and open-burn/open detonation units. Mr. Starkebaum has reviewed permit applications for more than 100 solid, hazardous, low-level radioactive and mixed-waste TSD facilities for EPA and the States of Colorado, Utah, New Mexico, Illinois, and Pennsylvania. He has also reviewed more than 20 Corrective and/or Remedial Action work plans, proposals, and reports (RFI/CMS and RI/FS) for the EPA and the State of Colorado, including six facilities with overlapping and conflicting RCRA/CERCLA provisions, which required significant coordination, negotiation, and compromise to resolve. He has performed RCRA compliance, closure, and permit inspections, prepared and executed soil, surface water, and groundwater sampling plans, and inspected construction of several landfills and groundwater pump and treat systems.

EPA Contract No. 68-W-99-017
EPA Work Assignment No. R06708
SBA Shipyards

Work Plan
Revision 0
August 20, 1999

Name: Wallace O'Rear
Role: Technical Support
P-Level: P-3

Qualifications: Mr. O'Rear is project coordinator with over 12 years experience in database design and document indexing, specifically relating to government documents. He has provided EPA with over six continuous years of support for litigation documents and PRP search document location and indexing phases. He is also experienced with records management requirements and the handling of confidential business information. Mr. O'Rear has supported RFAs and CEIs. He is 40-hour OSHA trained, has completed the supervisor training course and has recently completed the 8-hour annual refresher training. He has performed soil, groundwater, surface water and drum sampling activities at both RCRA and CERCLA facilities.

Metcalf & Eddy Staff

Name: Scott Irving
Role: Technical Support
P-Level: P-3

Qualifications: Mr. Irving is a project manager with eight years of experience in hazardous waste site investigation and remediation in CERCLA/SARA, RCRA, and LUST Program. Mr. Irving's experience includes project management, oversight of field activities and subcontractors, and the preparation of reports, proposals, work plans, and specifications. Mr. Irving's remediation experience includes assisting with the design and specification of remedial systems, installation oversight and system start-up, pilot testing and operation and maintenance of various remedial technologies. Mr. Irving's extensive technical knowledge in the areas of subsurface investigations, remedial technologies, and subcontractor management has led to significant cost/time savings for the clients in several instances.

Name: Jim Peeples
Role: Technical Support
P-Level: P-3

Qualifications: Mr. Peeples has worked extensively with numerical and analytical groundwater flow models including: MODFLOW, MODPATH, QuickFlow, WMFlow, GWPATH, and DREAM. His work with MODFLOW has included the use of many pre-processors and post-processors including: MODELCAD, Visual MODFLOW, Premod, POSTMOD, SURFER. He has used flow models to model groundwater flow as well as soil vapor flow. Remediation technologies Mr. Peeples has designed and operated: soil vapor extraction (SVE) systems, dual phase recovery systems, product only recovery systems, bioventing systems, other bioremediation systems, and groundwater pump and treat system.

Name: Michael Raimonde
Role: Technical Support
P-Level: P-3

Qualifications: Mr. Raimonde has over 12 years of experience in groundwater system design, analysis, modeling, and evaluation. He has performed project management for all phases of groundwater related remediation projects. Mr. Raimonde has performed in a technical capacity on several EPA Region 6 RCRA projects over the recent seven years.

Name: Scott Blanchard
Role: Technical Support
P-Level: P-2

Qualifications: Mr. Blanchard is a geologist with specific expertise in glacial geology and stratigraphy, geomorphology, and soil development. For over 5 years he has supervised and conducted numerous environmental, hydrogeologic, and geotechnical investigations. He has served as site health and safety officer, field supervisor, and has extensive experience in subcontractor coordination and management. Mr. Blanchard has been involved in the analysis and presentation of geologic, geotechnical and hydrogeologic data from a variety of projects. He is certified to conduct nuclear moisture-density and geotechnical testing and has operated a mobile geotechnical laboratory.

Name: J. Warburton
Role: Technical Support
P-Level: P-2

Qualifications: Mr. Warburton is involved in the collection and analysis of environmental data. His field experience includes the installation, development, sampling, and monitoring of groundwater monitoring wells and piezometers. He is currently participating in several bioremediation projects. Mr. Warburton has also conducted pumping tests and analyzed the resulting data. He has experience with various types of field equipment. Mr. Warburton also has experience in the construction industry.

VI. CONFLICT OF INTEREST CERTIFICATION

TechLaw, Inc. has conducted a thorough evaluation of potential Conflicts of Interest (COI) at the corporate level and for the personnel proposed for these projects. Therefore, we are certifying, to the best of our knowledge, that no actual or potential organizational or personal conflict of interest exist. All proposed personnel have been informed of their obligation to report personal and organizational conflicts of interest to TechLaw. Furthermore, TechLaw, Inc. recognizes its continued obligation to identify and report any actual or potential conflicts of interest that may arise during the performance of this work assignment or other work related to this work assignment.

VII. EXCEPTIONS/ANTICIPATED PROBLEMS

The activities and schedules presented in this work plan may need to be modified as work progresses if unforeseen circumstances are encountered. Exceptions or special requirements that arise during the project and impact the work plan will require a work assignment modification.

Based on the scoping meeting with the EPA WAM the following tasks were not costed in this work plan: Task 05 - Sampling Events and Task 06 - Public Involvement activities. If EPA determines that activities are needed under these tasks, a work assignment amendment would be required to fund these efforts and a revised work plan submitted.

The LOE estimates for Task 07, 08, and 09 are based on a best estimate as of the time of this work plan development. The actual number of pages and volume of data that needs to be processed may affect the estimated LOE and costs. If the effort ends up being larger than anticipated additional LOE and cost may be required.

VIII. QUALITY ASSURANCE

TechLaw's REPA Quality Assurance (QA) Program Plan has been incorporated by reference into the contract governing this work assignment. This work assignment and all subsequent activities and outputs may be the subject of a random audit pursuant to the QA Program Plan and carried out by the QA Officer, or his designee.

IX. ANTICIPATED LEVEL OF EFFORT

The anticipated level of effort (LOE) for the work assignment is provided in Attachment III. A mixture of P-levels were used based on the technical expertise needed per task.

X. COST ESTIMATE

The estimated costs are detailed in Attachment V. Please note that the cost estimate and schedule contained in this work assignment are based on the project being staffed by TechLaw employees and Metcalf & Eddy.

XI. SUBCONTRACT PLAN

The completion of these projects will include the use of a subcontractor. Metcalf & Eddy has been selected as a team member in completing this Work Assignment. Their area of involvement will be in Tasks 04 and 10 where cost estimating and actual remedial design is anticipated to occur.

XII. HEALTH AND SAFETY PLAN

In preparing for any sampling events under this work assignment, the TechLaw Team will complete a site-specific Health and Safety Plan (HASP) to identify the activities and potential hazards associated with the scheduled activities. Information to complete the HASP will be obtained from the EPA WAM and available Regional regulatory files. Prior to initiating any field activities, the HASP will be reviewed and approved by the TechLaw Health and Safety Director.

XIII. GOVERNMENT FURNISHED DATA

The following information will be supplied by the government during the implementation of this WA:

- Existing information related to the Facility.
- Draft or final work plans and reports, Draft Consent Order for reference and data related to the Facility.
- Media to be sampled, sample locations, constituents for laboratory analysis, desired sampling dates, and other logistical information related to either the initial site visit, soil or ground water sampling events, or field trips.

ATTACHMENT I

SCHEDULE

<u>Task</u>	<u>Description</u>	<u>Scheduled Date</u>
01	Submit Work Plan (revisions as necessary) (Extended due date) and QAPP	August 20, 1999
02	Meet with the EPA WAM (as necessary) and provide work assignment progress reports.	By the 20 th day of each month
03	Initial Document and File Review	Within 45 days upon receipt from EPA
04	Technical Review of Workplans and Reports	Within 45 days upon receipt from EPA
05	Sampling Event QAPP	Within 10 days of notification by EPA of sampling event
05	Sampling Events	Upon TDM
05	Sampling Report	Within 20 working days upon receipt of the data
05	Analytical Reports from laboratory to EPA	Within 7 days of receipt of data
06	Public Involvement Activities	Within 15 days of TDM

EPA Contract No. 68-W-99-017
EPA Work Assignment No. R06708
SBA Shipyards

Work Plan
Revision 0
August 20, 1999

ATTACHMENT I (Continued)

SCHEDULE

<u>Task</u>	<u>Description</u>	<u>Scheduled Date</u>
07	Administrative Records	Within 30 days of TDM
08	Imaged Documents	Within 30 days of TDM
09	Environmental Sample Analytical Results Database	TBD
10	Assessment report will be due after receipt of request.	Within 60 days of TDM

ATTACHMENT II

STAFF RESPONSIBILITY CHART

<u>Staff</u>	<u>Professional Level</u>	<u>Role</u>	<u>Areas of Responsibility</u>
D. Pandak	P4	Regional Manager	Management oversight; overall quality review; work plan and costing review.
A. Todd	T2	Technical Assistant to Staff	Administrative support; performs COI checks, assembles and edits work plans, project tracking, and editing of deliverables
P. Davol	P4	Work Assignment Manager	Management of subcontractors, conduct reviews and oversee staff performing Tasks 03, 04, 05, 06, and 07, 08, 09, and 10.
G. Starkebaum	P4	Technical Staff	Conduct evaluations under Tasks 03, 04, and 10
M. Nur	P3	Technical Staff/	Assist in general and specific evaluations under Tasks 03, 04, and 10.
D. Walker	P4	Quality Control Reviewer	QA/QC on deliverables for Tasks 03, 04, and 10
W. O'Rear	P3	Technical Staff	Oversee and support work under Task 07, 08, 09
W. Buckaloo	P2	Document Processing	Supervisory Support, and scanning Under Task 08

ATTACHMENT II (Continued)

STAFF RESPONSIBILITY CHART

<u>Staff</u>	<u>Professional Level</u>	<u>Role</u>	<u>Areas of Responsibility</u>
P. Gray	P2	Document Processing	Scanning and flagging and OCR under Task 08
A. Duckett	P2	Document Processing	Scanning and flagging and OCR under Task 08
J. Smiles	P2	Document Processing	Scanning and flagging and OCR under Task 08
T. Kahun	P3	Document Processing	Management support under Task 08
C. Lozano	P2	Document Processing	Database design support under Task 08
<u>Metcalf & Eddy</u>			
Scott Irving	P3	Technical Staff	Provide assistance in reviews and evaluations under Tasks 04 and 10.
Jim Peebles	P3	Technical Staff	Provide assistance in reviews and evaluations under Tasks 04 and 10.
Mike Raimonde	P3	Technical Staff	Provide assistance in review and evaluations under Task 04 and 10.

ATTACHMENT II (Continued)

STAFF RESPONSIBILITY CHART

<u>Staff</u>	<u>Professional Level</u>	<u>Role</u>	<u>Areas of Responsibility</u>
J. Warburton	P2	Technical Staff	Provide assistance in reviews and evaluations under Tasks 04 and 10.
S. Blanchard	P2	Technical Staff	Provide assistance in reviews and evaluations under Tasks 04 and 10.

ATTACHMENT III
ANTICIPATED LEVEL OF EFFORT

Staffing				Task											
Labor				Task											
Name	Firm	Category	01	02	03	04	05	06	07	08	09	10	TOTAL		
<u>Regional Manager</u>															
D. Pandak	TL	P-4	10	16	10	10	0	0	4	4	4	24	82		
<u>Work Assignment Manager</u>															
P. Davol	TL	P-4	10	38	10	10	0	0	10	10	10	10	108		
<u>Staffing</u>															
P. Davol	TL	P-4	10	0	65	30	0	0	5	50	0	80	240		
W. O'Rear	TL	P-3	6	0	0	0	0	0	20	0	40	10	76		
M. Nur	TL	P-4	0	0	160	60	0	0	0	0	0	160	380		
G. Starkebaum	TL	P-4	0	0	120	40	0	0	0	0	0	120	280		
D. Walker	TL	P-3	0	0	32	24	0	0	0	0	0	40	96		
T. Baugher	TL	P-1	0	0	0	0	0	0	40	0	80	0	120		
J. Housley	TL	P-1	0	0	0	0	0	0	0	0	80	0	80		
W. Buckaloo	TL	P-2	0	0	0	0	0	0	0	7	0	0	7		
P. Gray	TL	P-2	0	0	0	0	0	0	0	25	0	0	25		
A. Duckett	TL	P-2	0	0	0	0	0	0	0	25	0	0	25		
C. Lozano	TL	P-2	0	0	0	0	0	0	0	10	0	0	10		
T. Kuhn	TL	P-3	0	0	0	0	0	0	0	2	0	0	2		
J. Smiles	TL	P-2	0	0	0	0	0	0	0	24	0	0	24		
S. Cowan	TL	P-3	0	0	0	0	0	0	0	60	0	0	60		
A. Todd	TL	T-2	18	38	8	8	0	0	4	8	4	8	96		
S. Irving	M&E	P-3	0	10	0	0	0	0	0	0	0	0	10		
M. Raimonde	M&E	P-3	0	0	0	2	0	0	0	0	0	4	6		
J. Peebles	M&E	P-3	0	0	0	12	0	0	0	0	0	24	36		
G. Nack	M&E	P-3	0	4	0	0	0	0	0	0	0	0	4		
S. Blanchard	M&E	P-2	0	0	0	24	0	0	0	0	0	48	72		
J. Warburton	M&E	P-2	0	0	0	24	0	0	0	0	0	48	72		
TOTALS			54	106	405	244	0	0	83	225	218	576	1911		

Attachment IV - a
ESTIMATED TRAVEL COSTS

Staff/ Purpose of Trip	Total Days	From/To	Train/Air Fare \$	Hotel \$	Meals \$	Rental Car \$	Local Travel \$	Cost \$
P. Davol/ Review State Material	5	Austin, TX/ Baton Rouge, LA	\$250	\$236	\$190	\$300	\$60	\$1,036
S. Cowan/ Review State Material	5	Dallas, TX/ Baton Rouge, LA	\$250	\$236	\$190	\$0	\$60	\$736
Total			\$500	\$472	\$380	\$300	\$120	\$1,772

Notes:

Estimates for hotel and meals are based on allowable per diem rates for the destination city.
The calculations for these costs are shown in Attachment IV-b below.

Local travel includes cab fare, public transportation, mileage, parking and tolls.

The TechLaw team follows the requirements of subpart 31.2 of the FAR and the Federal regulations in incurring allowable travel costs under this work assignment.

The team will at all times seek and obtain government rates whenever available and observe current subsistence ceiling.

**ATTACHMENT IV-b
WORK SHEET FOR TRAVEL CALCULATIONS**

Staff/Purpose of Trip	Total Hotel and Total Meals Calculations
P. Davol/ Review State Material	Total Hotel: <u>4</u> days x <u>59</u> (per diem) = <u>\$236</u>
	Total Meals: <u>5</u> days x <u>38</u> (per diem) = <u>\$190</u>
S. Cowan/ Review State Material	Total Hotel: <u>4</u> days x <u>59</u> (per diem) = <u>\$236</u>
	Total Meals: <u>5</u> days x <u>38</u> (per diem) = <u>\$190</u>
TOTAL	Hotel: <u>\$472</u>
	Meals: <u>\$380</u>

ATTACHMENT V
 ESTIMATED COST

COST BREAKDOWN PER P-LEVEL AND TASK

ESTIMATED EXPENSES		COST
TECHLAW INC.		
Labor		\$110,718
Travel		\$1,772
Other Direct Costs		\$50
Supplies		\$1,944
Photocopy		\$1,370
Computer		\$752
Postage/ Deliver		\$685
Phone/Fax		\$510
Other Expenses		\$5,311
Total ODCs:		\$959
G&A on ODCs and Travel		\$118,760
TechLaw Inc.		
Subcontractor- M&E		
Labor		\$12,561
Travel		\$0
Other Direct Costs		\$60
Supplies		\$40
Photocopy		\$50
Postage/ Deliver		\$200
Phone/Fax		\$0
PC Recovery		\$100
Other Expenses		\$450
Total ODCs:		\$1,108
Fees:		\$14,516
Subcontractor Total:		\$397
TechLaw Sub G&A:		\$7,357
Fee: (3.85 * LOE)		\$140,633
Ending Total:		

P- Level	Cost Per Level	Avg. Cost Per Level	01	02	03	04	05	06	07	08	09	10	Total
P-4	\$78.22	\$85,262	30	54	365	150	0	0	19	64	14	434	1130
P-3	\$60.41	\$14,136	6	0	32	24	0	0	20	62	40	10	194
P-2	\$29.42	\$2,677	0	0	0	0	0	0	0	91	0	0	91
P-1	\$27.46	\$5,492	0	0	0	0	0	0	40	0	160	0	200
T-2	\$32.82	\$3,151	18	38	8	8	0	0	4	8	4	8	96
Total:			54	92	405	182	0	0	83	225	218	452	1711
Cost Per Task:			\$3,494	\$5,953	\$26,207	\$11,777	\$0	\$0	\$5,371	\$14,560	\$14,107	\$29,249	\$110,718

P- Level	Cost Per Level	Avg. Cost Per Level	01	02	03	04	05	06	07	08	09	10	Total
P-4		#DIV/0!	0	0	0	0	0	0	0	0	0	0	0
P-3		\$0.00	0	14	0	14	0	0	0	0	0	28	56
P-2		\$0.00	0	0	0	48	0	0	0	0	0	96	144
P-1		#DIV/0!	0	0	0	0	0	0	0	0	0	0	0
CL		#DIV/0!	0	0	0	0	0	0	0	0	0	0	0
Total:			0	14	0	62	0	0	0	0	0	124	200
Cost Per Task:			\$0	\$879	\$0	\$3,894	\$0	\$0	\$0	\$0	\$0	\$7,788	\$12,561
Total Both Firms: Labor Cost:			\$3,494	\$6,833	\$26,207	\$15,671	\$0	\$0	\$5,371	\$14,560	\$14,107	\$37,037	\$123,279
LOE:			54	106	405	244	0	0	83	225	218	576	1911

Average Labor Cost	
Per Hour For All Firms:	\$64.51
Project Average Hourly Rate:	\$73.59